

Northampton County
Ryan Keesler
D. Watson
Laisha Ramos
J. Rosario
A. Rosario
Caleb Pinkowski
K. Davis
Zorilla
Pagan
S. Boyd
Robert Thoma
Michael Chlebowksi
Oliver LaRocco
Blake Haring
Shawn Scott
Thomas Herstich
Jodi Ruggiero
Hernandez
Anthony Pier

Primecare Medical Inc
Paulina Foley
Lauren Tamburino
Shane P. Caffery
Darcey L. Fritz
Kathleen A. Mahr
Bonnie Gleason
Iraida Candia-Romero
Melody
Payton
Ladonna
Nathalia
Ivy
Joan L. Kneas

By: August B. Keir

I Declare (Certify, Verify or state)
Under Penalty of Perjury that the foregoing is
true and correct.

Executed: 03/05/2025

Douglas Byker from iv

The papers contained
within this application to proceed
in District Court Without Prepaying
Fees or Cost. In the United States
District Court For The Eastern District
of Pennsylvania.

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

Case No.

(to be filled in by the Clerk's Office)

August Byron Kreis, IV

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
 If the names of all the plaintiffs cannot fit in the space above,
 please write "see attached" in the space and attach an additional
 page with the full list of names.)

-v-

see attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the
 names of all the defendants cannot fit in the space above, please
 write "see attached" in the space and attach an additional page
 with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Northampton County

Ryan Keesler

D. Watson

Laisha Ramos

J. Rosario

A. Rosario

Caleb Pinkowski

K. Davis

Zorilla

Pagani

S. Boyd

Robert Thoma

Michael Chlebowksi

Oliver LaRocco

Blahe Haring

Shawn Scott

Thomas Herstich

Jodi Ruggiero

Hernandez

Anthony Pier

D A N T S

Primacare Medical Inc.

Paulina Foley

Lauren Tamburino

Shane P. Caffery

Darcey L. Fritz

Kathleen A. Mahr

Bonnie Gleason

Iraida Candia-Romero

Melody

Payton

Ladonna

Nathalia

Ivy

Joan L. Kneas

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

All other names by which you have been known:

ID Number

Current Institution

Address

August B. Kreis IVAugust Kreis, Byron, and Byron Kreis
0005264Northampton County Prison666 Walnut StreetEaston PA 18042

City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Shield Number

Employer

Address

Northampton County
Political SubdivisionPennsylvania
669 Washington Street
Easton PA 18042 Individual capacity Official capacity

Defendant No. 2

Name

Job or Title (if known)

Shield Number

Employer

Address

Ryan Heesler
Classification/Administration/DisciplinaryNorthampton County DOC
666 Walnut Street
Easton PA 18042 Individual capacity Official capacity

Defendant No. 3

Name

Job or Title (if known)

Shield Number

Employer

Address

Caleb Pinkowski
Corrections Officer

547Northampton County DOC666 Walnut StreetEastonPA18042

City

State

Zip Code

 Individual capacity Official capacity

Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

A. Rosario

Corrections Officer

521Northampton County DOC666 Walnut StreetEastonPA18042

City

State

Zip Code

 Individual capacity Official capacity

II Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A Are you bringing suit against (check all that apply):

 Federal officials (a *Bivens* claim)

 State or local officials (a § 1983 claim)

B Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?1st8th14th Amendments

B. Defendants

Defendant No. 5

Name

Laisha Ramos

Job or Title (if known)
Corrections officer

Shield Number

544

Employer

Northampton County DOC

Address

666 Walnut Street

Easton PA 18042

Individual Capacity Official Capacity

Defendant No. 6

Name

J. Rosario

Job or Title (if known)

Corrections officer

Shield Number

332

Employer

Northampton County DOC

Address

666 Walnut Street

Easton PA 18042

Individual Capacity Official Capacity

B. Defendants

Defendant No. 7

Name

Job or Title (if known)

Shield Number

Employer

Address

K. Davis

Corrections officer

① 64

Northampton County DOC

666 Walnut Street

Easton PA 18042

city state zip code

Individual Capacity Official Capacity

Defendant No. 8

Name

Job or Title (if known)

Shield Number

Employer

Address

Robert Thoma

Corrections officer

497

Northampton County DOC

666 Walnut Street

Easton PA 18042

city state zip code

Individual Capacity Official Capacity

I. The Parties to this complaint
B. The Defendants

Defendant No. 9

Name

Paganí

Job or Title (if known)

Corrections Officer

Shield Number

523

Employer

Northampton County DOC

Address

666 Walnut Street

Easton

city

PA

state

18042

zip code

Individual Capacity

Official Capacity

Defendant No. 10

Name

Zorilla

Job or Title (if known)

Corrections officer

Shield Number

375

Employer

Northampton County DOC

Address

666 Walnut Street

Easton

city

PA

state

18042

zip code

Individual Capacity

Official Capacity

B. The Defendants

Defendant No. 11

Name

Job or Title (if known)

Shield Number

Employer

Address

D. Watson

Corrections Officer

438

Northampton County DOC

666 Walnut Street

Easton

PA

18042

Individual capacity

ZIP code

Official capacity

Defendant No. 12

Name

Job or Title (if known)

Shield Number

Employer

Address

S. Boyd

Corrections Officer

502

Northampton County DOC

666 Walnut Street

Easton

PA

18042

city

state

ZIP code

Individual capacity Official capacity

B. The Defendants

Defendant No. 13

Name

Prime care Medical Inc.

Job or Title(if known)

Inmate medical Health care

Shield Number

Employer

Corporation

Address

3940 Locust Lane

Harrisburg PA
city state zip code

Individual Capacity Official Capacity

Defendant No. 14

Name

Paulina Foley

Job or Title(if known)

PA-C

Shield Number

Employer

Primecare Medical Inc.

Address

666 Walnut Street

Easton PA
city state zip code

Individual Capacity Official Capacity

B. The Defendants

Defendant No. 15

Name Shane P. Caffery
Job or title (if known) Director of Nursing
Shield Number
Employer Primecare Medical Inc.
Address 666 Walnut Street
City Easton State PA Zip code 18042
 Individual Capacity Official Capacity

Defendant No. 16

Name Lauren Tamburino
Job or Title(if known) Medical Administrator
Shield Number
Employer Primecare Medical Inc.
Address 666 Walnut Street
City Easton State PA Zip code 18042
 Individual Capacity Official Capacity

B. The DefendantsDefendant No. 17NameDarcey L. FritzLPNJob or Title(if known)Shield NumberEmployerPrimecare Medical Inc.Address666 Walnut StreetEaston
cityPA
state18042
zip code Individual Capacity Official CapacityDefendant No. 18NameKathleen A. MaherJob or Title (if known)Registered NurseShield NumberPrimecare Medical Inc.666 Walnut StreetEaston
cityPA
state18042
zip code Individual Capacity Official Capacity3 of 11 continuedAugust B. Kain IV

B. The Defendants

Defendant No. 19

Name

Job or Title(if known)

Shield Number

Employer

Address

Iraida Candia-Romero

LPN

Primecare Medical Inc.

666 Walnut Street

Easton PA 18042

Individual Capacity Official Capacity

Defendant No. 20

Name

Job or Title (if known)

Shield Number

Employer

Address

Bonnie Gleason

LPN

Primecare Medical Inc.

666 Walnut Street

Easton PA 18042

Individual Capacity Official Capacity

Page 3 of 11 continued

August 3, 2023

I. Parties to this complaintB. The DefendantsDefendant No. 21NameMelodyJob or Title (if known)Registered NurseShield NumberEmployerPrimacare Medical Inc.Address666 Walnut StreetEastoncityPAstate18042zip code Individual Capacity Official CapacityDefendant No. 22NameMichael ChlebowskiJob or Title (if known)Corrections LieutenantShield Number25EmployerNorthampton County DOCAddress666 Walnut StreetEastoncityPAstate18042zip code Individual Capacity Official Capacity

B. The Defendants

Defendant No. 23

Name

Oliver LaRocco

Job or Title (if known)

Corrections Lieutenant

Shield Number

38

Employer

Northampton County DOC

Address

666 Walnut Street

Easton

city

PA

state

18042

zip code

Individual Capacity Official Capacity

Defendant No. 24

Name

Blake Haring

Job or Title (if known)

Corrections Sergeant

Shield Number

4

Employer

Northampton County DOC

Address

666 Walnut Street

Easton

city

PA

state

18042

zip code

Individual Capacity Official Capacity

Defendant No. 25

Name

Job or Title (if known)

Shield Number

Employer

Address

Shawn Scott

Corrections Officer

543

Northampton County DOC

666 Walnut Street

Easton PA 18042
city state zip code

Individual Capacity Official Capacity

Defendant No. 26

Name

Job or Title (if known)

Shield Number

Employer

Address

Thomas Herstich

Grievance Administrator

Northampton County DOC

666 Walnut Street

Easton PA 18042
city state zip code

Individual Capacity Official Capacity

B. The Defendants

Defendant No. 27

Name

Payton

LPN

Job or Title (if known)

Shield Number

Employer

Primecare Medical Inc.

Address

666 Walnut Street

Easton

city

PA

state

18042

zip code

Individual Capacity Official Capacity

Defendant No. 28

Name

Ladonna

Job or Title (if known)

LPN

Shield Number

Employer

Primecare Medical Inc.

Address

666 Walnut Street

Easton

city

PA

state

18042

zip code

Individual Capacity Official Capacity

B. The Defendants

Defendant No. 29

Name _____
 Job or Title (if known) _____
 Shield Number _____
 Employer _____
 Address _____

Anthony Pier
Corrections Lieutenant
37
Northampton County Doc
666 Walnut Street
Easton PA 18042
 Individual Capacity Official Capacity

Defendant No. 30

Name _____
 Job or Title (if known) _____
 Shield Number _____
 Employer _____
 Address _____

Jodi Ruggiero
Head of the Northampton County Jail Board
Northampton County DOC
666 Walnut Street
Easton PA 18042
 Individual Capacity Official Capacity

Defendant No. 31

Name

Hernandez

Job or Title (if known)

Corrections Officer

Shield Number

457

Employer

Northampton County DOC

Address

666 Walnut Street

Easton PA 18042
city state zip code

Individual Capacity Official Capacity

Defendant No. 32

Name

Nathalia

Job or Title (if known)

LPN

Shield Number

Employer

Primacare Medical Inc.

Address

666 Walnut Street

Easton PA 18042
city state zip code

Individual Capacity Official Capacity

Page 3 of 11 continued

August B. Kins IV

B. The Defendants

Defendant No. 33

Name

Ivy
LPN

Job or Title (if known)

Shield Number

Employer

Primecare Medical Inc.

Address

666 Walnut Street

Easton PA 18042

city

state

zip code

Individual Capacity Official Capacity

Defendant No. 34

Name

Joan L. Kneas

Job or Title (if known)

LPN

Shield Number

Employer

Primecare Medical Inc.

Address

666 Walnut Street

Easton

PA

18042

city

state

zip code

Individual Capacity Official Capacity

Page 3 of 11 continued

August B. Kreisw

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See attached

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- Pretrial detainee
- Civilly committed detainee
- Immigration detainee
- Convicted and sentenced state prisoner
- Convicted and sentenced federal prisoner
- Other (explain) Pretrial detainment 8/24/2024 - 11/17/2024 to
Sentenced county inmate 11/8/2024 — filling of complaint.

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

Northampton County Prison 8/24/2024 — Filling of complaint

1. Northampton County is a Municipality/Subdivision acting under the color of the Pennsylvania State flag.
2. Ryan Keesler is a jail Administrator for the Northampton County DOC acting under the color of the Pennsylvania state flag.
3. Caleb Pinkowski is a corrections Officer for Northampton County Prison acting under the color of the Pennsylvania state flag.
4. A. Rosario is a corrections Officer for Northampton County Prison acting under the color of the Pennsylvania state flag.
5. Liasha Ramos is a Corrections Officer for Northampton County Prison acting under the color of the Pennsylvania state Flag.
6. J. Rosario is a Corrections Officer for Northampton County Prison acting under the color of the Pennsylvania state Flag.
7. K. Davis is a Corrections Officer for Northampton County Prison acting under the color of the Pennsylvania state Flag.
8. Robert Thoma is a corrections officer for Northampton County Prison acting under the color of the Pennsylvania state Flag.

II. Basis for Jurisdiction

①.

9. Pagani is a corrections officer for Northampton County Prison acting under the color of the Pennsylvania state flag.
10. Zorilla is a corrections officer for Northampton County Prison acting under the color of the Pennsylvania State flag.
11. D. Watson is a corrections officer for Northampton County Prison acting under the color of the Pennsylvania State flag.
12. S. Boyd is a corrections officer for Northampton County Prison acting under the color of the Pennsylvania State flag.
13. Primecare Medical Inc. is a contracted inmate health care corporation for Northampton County Prison acting under the color of the Pennsylvania state flag.
14. Paulina Foley is a Primecare Medical Inc employee acting/working under the color of the Pennsylvania state flag.
15. Shane P. Caffery is a Primecare Medical Inc employee acting/working under the color of the Pennsylvania state flag.

II. Basis for Jurisdiction

D.

16. Lauren Tamburino is a Primecare Medical Inc. employee acting/working under the color of the Pennsylvania State Flag.

17. Darcey L. Fritz is a Primecare Medical Inc. employee acting/working under the color of the Pennsylvania State Flag.

18. Kathleen A. Mahr, is a Primecare Medical Inc. employee acting/working under the color of the Pennsylvania State Flag.

19. Bonnie Gleason is a Primecare Medical Inc. employee acting/working under the color of the Pennsylvania State Flag.

20. Iraida Candia-Romero is a Primecare Medical Inc. employee acting/working under the color of the Pennsylvania State Flag.

21. Melody is a Primecare Medical Inc. employee acting/working under the color of the Pennsylvania State Flag.

22. Michael Chlebowski is an employee of the Northampton County DOC acting/working under the color of the Pennsylvania State Flag.

II Basis of Claim D.

23. Oliver LaRocca is a Lieutenant for the Northampton County Prison acting under the color of the Pennsylvania state flag.
24. Blake Haring is a corrections Sergeant for the Northampton County Prison acting under the color of the Pennsylvania state flag.
25. Shawn Scott is a corrections Officer for the Northampton County Prison acting under the color of the Pennsylvania state flag.
26. Thomas Herstich is a grievance administrator for the Northampton County Prison acting under the color of the Pennsylvania state flag.
27. Payton is a CN for the contracted inmate medical care company Primecare Medical Inc. acting/working under the color of the Pennsylvania state flag.
28. Ladonna is a CN for the contracted inmate medical care company Primecare Medical Inc. acting/working under the color of the Pennsylvania state flag.
29. Anthony Pier is a Lieutenant for the Northampton County Prison acting under the color of the Pennsylvania state flag.
30. Jodi Ruggiero is the Head of the Northampton County Jail Advisory Board acting under the color of the Pennsylvania state flag.

II. Basis of Jurisdiction

D.

31. Hernandez is a corrections officer for the Northampton County Prison acting under the color of the Pennsylvania state Flag.
32. Nathalie is a LPN for the contracted inmate medical care company Primecare Medical Inc. acting under the color of the Pennsylvania state Flag.
33. Ivy is a LPN for the contracted inmate medical care company Primecare Medical Inc. acting under the color of the Pennsylvania state Flag.
34. Joan L. Kneas is a LPN for the contracted inmate medical care company Primecare Medical Inc acting under the color of the Pennsylvania State Flag.

II. Basis of Jurisdiction

D.

Page 4 of 11 continued

X August B. Heino

C. What date and approximate time did the events giving rise to your claim(s) occur?

See Attached

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See Attached

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Severe Mental Anguish, sever headaches and dizziness, light headedness, upper and lower back pain, Neck pain, pain in my right knee, and placing my life in danger of irreversible harm. I will need to see my neurologist to get my seizures stabilized, and Mental Therapy not available in this jail.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Punitive damages of 10,000,000,00 for violations of my Civil Rights.

Injunctive relief to have the Federal Court investigate the Northampton County Prison for dirty and draconian living conditions, lack of respect for the value of human life, and inadequate medical care,

* In numbered order of claims

1. 8/24/2024	8:33 am
2. 9/4/2024	8:00 am
3. 9/15/2024	3:00 pm
4. 9/16/2024	11:30 am
5. 9/17/2024	1:30 pm
6. 9/18/2024	10:45 am
7. 9/24/2024	11:00 am
8. 9/25/2024	3:30 pm
9. 9/27/2024	3:35 pm
10. 9/30/2024	2:00 pm
11. 10/02/2024	5:00 pm
12. 10/03/2024	6:09 am
13. 10/03/2024	7:00 am
14. 10/03/2024	9:30 am
15. 10/03/2024	3:00 pm
16. 10/04/2024	2:00 pm

IV. Statement of claim

C.

17.	10/06/2024	6:35 pm
18.	10/06/2024	10:01 pm
19.	10/07/2024	9:25 am
20.	10/08/2024	6:00 am
21.	10/08/2024	7:30 am
22.	10/16/2024	11:30 am
23.	10/18/2024	9:25 am
24.	10/18/2024	8:00 pm
25.	10/26/2024	6:50 pm
26.	10/27/2024	8:10 am
27.	10/27/2024	8:50 pm
28.	10/28/2024	9:18 pm
29.	10/31/2024	8:45 pm
30.	11/02/2024	8:09 pm
31.	11/03/2024	8:46 am
32.	11/03/2024	9:04 am
33.	11/03/2024	9:04 am
34.	11/13/2024	2:30 pm
35.	11/17/2024	10:15 am
36.	11/22/2024	7:50 pm
37.	11/29/2024	7:40 pm

*IV. Statement of Claim

C

38.	12/01/2024	2:38 pm
39.	12/02/2024	2:40 pm
40.	12/04/2024	1:10 pm
41.	12/04/2024	2:05 pm
42.	12/06/2024	7:00 pm
43.	12/06/2024	9:00 pm
44.	12/07/2024	8:00 am
45.	12/07/2024	7:10 am
46.	12/08/2024	9:00 am
47.	12/08/2024	2:45 pm
48.	12/09/2024	7:22 am
49.	12/09/2024	9:15 am
50.	12/09/2024	7:00 pm
51.	12/10/2024	3:00 pm
52.	12/10/2024	7:20 AM
53.	12/11/2024	7:23 AM
54.	12/12/2024	9:15 AM
55.	12/13/2024	8:15 AM
56.	12/13/2024	11:15 am
57.	12/13/2024	4:00 pm
58.	12/14/2024	7:30 am
59.	12/14/2024	6:50 pm
60.	12/15/2024	6:50 am

C.

61.	12/15/2024	9:55 am
62.	12/16/2024	8:00 am
63.	12/16/2024	6:54 pm
64.	12/17/2024	7:00 am
65.	12/17/2024	7:15 am
66.	12/17/2024	1:20 pm
67.	12/18/2024	8:00 am
68.	12/19/2024	7:30 am
69.	12/19/2024	1:00 pm
70.	12/20/2024	8:20 am
71.	12/21/2024	8:15 am
72.	12/23/2024	1:00 am
73.	12/24/2024	1:36 pm
74.	12/25/2024	9:53 am
75.	12/26/2024	7:49 am
76.	12/27/2024	7:48 am
77.	12/27/2024	6:50 pm
78.	12/27/2024	6:55 pm
79.	12/29/2024	7:05 pm
80.	12/30/2024	7:40 am
81.	1/1/2025	7:45 am
82.	1/2/2025	10:35 am
83.	1/3/2025	9:15 pm
84.	1/4/2025	8:15 am
85.	1/4/2025	1:30 pm
86.	1/4/2025	6:00 pm
87.	1/7/2025	10:00 am

C.

88.	1/18/2025	2:45 pm
89.	1/19/2025	8:09 am
90.	1/10/2025	8:13 am
91.	1/14/2025	8:35 am
92.	1/15/2025	9:45 am
93.	1/16/2025	8:40 am
94.	1/18/2025	8:25 am
95.	1/20/2025	8:08 am
96.	1/23/2025	9:30 am
97.	1/23/2025	11:30 am
98.	1/23/2025	1:15 pm
99.	1/23/2025	3:05 pm
100.	1/24/2025	8:50 am
101.	1/24/2025	11:30 am
102.	1/28/2025	7:36 am
103.	1/29/2025	8:11 am
104.	1/29/2025	7:25 pm
105.	02/02/2025	8:15 am
106.	02/04/2025	6:30 am
107.	02/05/2025	11:10 am
108.	02/05/2025	11:00 am
109.	02/6/2025	8:05 am
110.	02/08/2025	8:10 am

C.

111. 2/9/2025	8:20 am
112. 2/10/2025	7:55 am
113. 2/10/2025	6:50 pm
114. 2/11/2025	6:34 am
115. 2/11/2025	7:25 am
116. 2/11/2025	8:15 pm
117. 2/12/2025	8:15 am
118. 2/12/2025	7:15 pm
119. 2/13/2025	8:00 am
120. 2/13/2025	8:30 pm
121. 2/14/2025	3:00 pm
122. 2/14/2025	8:57 pm
123. 2/16/2025	1:30 pm
124. 2/16/2025	7:15 pm
125. 2/18/2025	10:30 am
126. 2/19/2025	8:15 pm
127. 2/20/2025	9:05 pm
128. 2/21/2025	8:00 am
129. 2/24/2025	10:00 am
130. 2/26/2025	5:15 pm

C

1. Upon Case#5:25-cv-01486-JLS Document 2 Filed 03/12/25 Page 35 of 166 Prison I was not given my ONFI "Life Sustaining anti Convulsant" for control of severe epilepsy for five (5) days until the date of 8/29/2024 and then sometimes given doses of generic version, and sometimes not, up until 9/15/2024. I asked the Primecare Medical Inc. LPNs "Why am I not getting my ONFI anti convulsant?" and they stated "We don't have it." Upon my transfer to the Prison I signed a property sheet at the Bethlehem City Police Station and I personally viewed the medication being in custody with my personal property. When I was transferred by The Bethlehem City Police to Northampton County Prison the medication was given to Corrections Officer D. Watson badge # 438 and she stated to me "I gave all medications to Primecare staff" even though Primecare staff stated "We were never given an ONFI anti convulsant." Due to Officer D. Watson missplacing my medication after taking my property and me not getting my ONFI "Life Sustaining Anti Convulsant" at all up until the date of 8/29/2024 and then inconsistantly up until 9/15/2024 it caused a "break through" seizure on 9/15/2024 on F Tier with Correction Officer James Spaziani badge # 552 calling a "code Blue" medical emergency and my life being placed in danger of Death, retardation or paralysis. DON Shane P. Caffery is in charge of medication and/or the pharmacy in Northampton County Prison, and distribution of the medication by Primecare Medical Inc. in Northampton County Prison.

IV. Statement of Claim

D

Page 5 of 11 continued

August 8, 2024

Cell No.	Department of Corrections Inmate Request	Date:
<u>F2</u>	<u>Classification</u>	<u>9/2/2024</u>
<p>I specifically request: <u>You aware that with my severe sleep apnea there is a chance of physical assault between me and other inmate being in my cell resulting in a failure to protect.</u></p> <p><u>August 20, 2024</u></p>		
Inmate Name (Print)		Inmate Perm Number
Block Officer Reply:		
Official Use Only		
Forward to:	Officer's Name/ Badge No. (Print)	
<input type="checkbox"/> Director <input type="checkbox"/> Warden <input type="checkbox"/> Treatment <input type="checkbox"/> Classification <input type="checkbox"/> Records <input type="checkbox"/> Lt. <input type="checkbox"/> CCF		
<input type="checkbox"/> Inmate Accounts <input type="checkbox"/> Profess. Responsibility <input type="checkbox"/> Operations <input type="checkbox"/> Pre-trial / Probation <input type="checkbox"/> Pub. Def. <input type="checkbox"/> Med		
NCP Form No. NCP - 139A		

CC

Exhibit to claim 2.

28 C. 5, C. 95 / 1746

I declare (or certify, verify, or state) under Penalty of Perjury that the foregoing is true and correct.
Executed on 9/2/2024, August B. Jones

2. Classification Administrator Ryan Keesler came onto F tier threatening me with physical assault and using obscene language because, I sent a request slip to administration stating that "I refused to fight with people having my medical problems which will lead to a failure to protect." Ryan Keesler stated to me on F tier in front of witness Corrections Officer Tony Hampton badge # 296 "If you ever send me another request slip like this Kreis I will beat the shit out of your fucking 5' 6" tall pussy ass! You have been trying to sue us for years you bitch! How is that going for you asshole? If you ever send me any request slips or grievances about shit I will house you alone on E tier or administrative Segregation you pussy! Do you want to fight? Hell I will give you my address!" Then he stormed off the tier. Officer Tony Hampton badge # 296 stated "I think you should just fall back and be quite Kreis.", after Ryan Keesler left the tier, All in retaliation for me seeking my constitutionally protected right to redress in the federal court case 21-CV-236(X).

IV. Statement of Claim

D.

3. A "Code Blue" medical Emergency because, I had an epileptic episode due to inconsistent medication by primecare Medical Inc. even bringing my own "life sustaining Anti convulsants" into the facility and it is DON Share P. Caffery's responsibility to maintain the pharmacy in Northampton County Prison and distribution of medications. Corrections Officer James Spaziani badge #552 called the "Code Blue", Responding Primecare Medical Inc. LPN Darcey L. Fritz came onto F Tier and stated "Oh GOD Kreis again, whatever he is fine." Darcey told the Block Officer James Spaziani to just "tell me to check you here and there.", I was told this by Officer James Spaziani this was told to him. LPN Darcey L. Fritz told the DOC officers that there was no need to take me to medical or place me on "Medical Observation" in which Darcey L. Fritz knows I am supposed to be on at all times pursuant to St. Lukes Neurology Associates Dr. Chad Edward Saunders M.D. Neurologist. Darcey L. Fritz was an employee during the time of my related pending lawsuit of Constitutional Right 5:21-CV-2360 CMR. Her action in retaliation. All was caught on DOC cameras.

IV. Statement of Claim

D.

4. I Case 5:25-cv-01486-JLS Document 2 Filed 03/12/25 Page 40 of 166m to speak to DON Shane P. Caffery and PA-C Paulina Foley about my epileptic episode the previous day and I explained it was because of inconsistancy of receiving medication and inconsistancy of distribution times. Both of which are directly related to DON shane P. Caffery's responsibility. Paulina Foley also stated "I will take care of that", but nothing changed. Pursuant to page 58 of 62 in the "Northampton County Official Handbook" it states that of times are required by physician it will be provided. Pursuant to St. Lukes Neurology Associates Dr. Chad Edward Saunders M.D. my medications are important to be administered 12 hours apart to maintain blood levels. DON shane P. Caffery and PA-C Paulina Foley know this because both are defendants in related Constitutionally protected Right to pending case 5:21-CV-2360 CMR and Primecare Medical Inc. in Northampton County Prison was made aware of the required conditions of continued care to avoid irreversible harm. Death, paralysis, and retardation. St. Lukes Neurology Dr. Chad Edward Saunders M.D. also made it required for me to be on "Medical Observation" which F Tier is not. The actions of DON shane P. Caffery is in retaliation of pending case 5:21-CV-2360 CMR and PA-C is in retaliation of the same case and acknowledgement and acquiescence of DON shane P. Caffery's actions and/or inactions.

IV. Statement of Claim

D.

Page 5 of 11 continued

August B. Kurn IV

5. I was taken by the Northampton County Sheriffs to the Fountainhill St. Lukes Hospital Campus to 701 Ostrum Street St. Lukes "Sleep medicine" to see Dr. Suneel Valla M.D. Specialist and I was told in my last "Sleep Study" I had done shortly after my release on 02/15/2023 that I had stopped breathing cutting off oxygen to my brain over 300 times in a 3 hour study due to the exacerbation of my severe OSA during the time I was in Northampton County Prison from the dates of 11/09/2020 to my release on 02/15/2023 do to inadequate medical care and deliberate indifference to my serious medical needs. This was the reason Dr. Chad Edward Saunders M.D. of St. Lukes Neurology Associates ordered that I should be on "Medical Observation". Primecare Medical Inc. at Northampton County Prison know's pursuant to medical file entries of my need for "Medical Observation" and my serious medical needs in general, but they are ignoring them in deliberate Indifference in result of retaliation for my constitutional right to file pending case #198351-21-CV-02360X CMR.

IV. Statement of Claim

D.

(e. I was called to the medical exam room to speak to PA-c Paulina Foley and DON shane P. Caffery about the rental of a CPAP for breathing assistance of my severe OSA and that it had to be "cleared" by the corporate office. As a result of Primecare Medical Inc. not monitoring or admonishing its employees is why the medical care at Northampton County Prison is so bad and renting a CPAP is the only thing Primecare Medical Inc./Northampton County Prison has done for my serious medical needs diagnosed by Dr. Suneel Valla M.D. of St.Lukes sleep study and St.Lukes Neurology Dr. Chad Edward Saunders M.D. both needing continued care to avoid irreversible harm, causing (SUDEP) Death, retardation, paralysis. Primecare Medical Inc. is not monitoring that the medical care in Northampton County Prison is up to standard of its own companies policies. Endanger my life and causing pain.

IV. Statement of Claim

D.

Page 5 of 11 continued

Xander S. Kress

7. I spoke to Judi Ruggiero from the "Jail Advisory Board" about my "Code Blue" for an epileptic episode and giving my medication at random times or even not getting doses and how this affects my diagnosed health conditions for continued medical care to avoid irreversible harm. The Jail Board's Job is to help inmates stay safe and fix problems within the jail, but she refused to directly confirm my complaint and nothing changed. The first time I approached her she said I was giving her an attitude and told me "Get the hell away from me." Northampton County does not acknowledge anything medical even if it is life threatening. Corrections Officer Lanekqua Harrison badge # 553 was present.

IV. STATEMENT OF CLAIM

D.

Page 5 of 11 continued

Xungo T. B. Kuniw

8. I was sent to E tier "the Hole" by Corrections officer Laisha Ramos badge # 544 when she lied on a formal misconduct when she stated that I made the comment to her "Fuck the air you're breathing". When I was escorted to the medical exam room before being brought to "the Hole", so I can be "medically cleared", PA-C Paulina Foley was in the room and when asked if I was "clear", she waved her hand in arrogance that there is no "DOJ" orders that the DOC must follow and I was "clear" to be placed in "the hole". This is the first time it was acknowledged that upon my intake I was never placed on "Medical observation" and in retaliation my life was and is being put in danger by Paulina Foley and all named Primecare Medical Inc. staff as a result of the constitutionally protected Right to seek redress in the federal court and now all medical staff in general act in retaliation to my right by inadequate medical care and placing my life in Danger of SBI/Death (SUDEP). Officer Doyle badge 202 immediately notified medical of my choking and was told "He is fine". I had to plead guilty to the misconduct because of fear of Ryan Keesler's threats and he does disciplinary hearings.

IV. Statement of Claim

D.

8 Continued, Primecare Medical Inc. of Northampton
Case 5:25-cv-01486-JLS Document 2 Filed 03/12/25 Page 45 of 106
County Prison treating my serious medical needs with
deliberate Indifference. The serious medical needs I
have were diagnosed by St. Lukes Neurologist Dr. Chad
Edward Saunders M.D., requiring continued care to
prevent irreversible harm of (SUDEP) Death, retard-
ation, or paralysis and St. Lukes Sleep medicine Dr.
Suneel Valla M.D. for continued Breathing assistance.

IV. Statement of Claim
D.

Page 5 of 11 continued

August B. Krenow

9. The block officer on F tier called post 17 medical station and Corrections Officer Ziorilla badge # 375 who immediately answered the phone stated "tell that shmuck he can wait!" and hung up. Five (5) minutes later Post 17 Officer Ziorilla called back stating "That piece of shit has no medicine hear LOL." As a result of this I never got tylenol for a severe headache. The officer at post 17 was on speaker phone and officer C. Pinkowski badge # 547 heard all of it.

IV. Statement of claim

D.

10. Correctional Officer Pagani badge # 523 Lied on a formal misconduct stating that I shoved another inmate in which I did not then stated I made a racial slur. I had no choice but to plead guilty to the misconduct before Keesler, or he would give me more time. As a result of his threats I was afraid he will do something adverse to me. I was given a CPAP machine earlier in the day with a "DOJ" order in which the DOC must follow so I was NOT clear for "The Hole" as there is no outlets there. I ended up being kept in cell F14 and just placed on "Disciplinary Segregation". Officer Pagani took everything from me, including legal work, never inventoried any of it or had me sign a property sheet. It is constitutionally protected to do legal research and as a result of who my Father is acted as such, some research was lost.

IV. Statement of Claim

D.

11. I asked Corrections Officer A. Rosario for medical assistance for my CPAP breathing assistance Therapy for continued care of a serious medical need diagnosed by Dr. Sunee Valla M.D. from St. Lukes Sleep Medicine. I was told to "Go Away" and she refused to call medical even with a "DOJ" order with the therapy, causing me tochoak while sleeping, and opening the chance for severe injury or death during sleep via nocturnal seizure causing (SUDEP) Sudden Unexpected Death In Epilepsy, Retardation, or paralysis.

N. Statement of claim
D

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12. Corrections Officer A. Rosario turned off the power outlet to my "DOJ" ordered CPAP rendering it unusable and I woke up choking. I explained to her that the light switch, because of the current wiring configuration, shuts off the power outlet and she stated "to bad the switch is staying in the on position." Denying me continued therapy for my serious medical needs diagnosed by Dr. Sunee Valla M.D. of St. Lukes Sleep medicine. Giving me the chance of choking and sleep deprivation, and (SUDEP). A "breath through Siezure."

IV. Statement of Claim

D.

13. Corrections Officer A. Rosario watched over Primecare Medical Inc. LPN Bonnie Gleason giving medication on F tier and when given my medication I asked LPN Bonnie Gleason "why is there no Trileptal for my epilepsy?" and she stated "we have no more". So I didn't get my life sustaining anti convulsant this morning due to DON Shane P. Caffery not ordering Trileptal and/or even Oxcarbazepine (generic), which is DON shane P. Caffery's job to do at Northampton County Prison. As a result of his actions/inactions I received inadequate medical care and my life was put in danger of SBI or Death (SUDEP), all stemming from retaliation of filing my §1983 in May 2021 which is pending before the court 21-CV-2360 and was my Constitutional Right to do so.

IV. Statement of Claim
D.

14. Corrections Officer A. Rosario was letting inmates come over to my cell "F14" and turn the switch and/or Power Outlet on and off, even after notifying her, denying the use of my CPAP "DOJ" cleared Treatment. She did not stop the other inmates like her Duty calls. Care , Custody ,and Control.

IV. Statement of Claim

D.

15. I asked Corrections Officer K. Davis badge # Q64 "please turn the switch so I can use my CPAP" and I showed him the "DOJ" order so it work in the cell. Officer K. Davis stated "No one told me about it so the switch is staying on, I don't know." I was denied medical care for a serious medical need from sleep medicine even with the "DOJ" order.

IV. Statement of Claim

D.

16, I asked Corrections Officer Caleb Tinkowski badge # 547 after he turned my outlet off "please turn the outlet on so my CPAP will work so I can breath." I showed the "DOJ" order and he stated "Yeah okay Whatever" and never turned the outlet back on denying me the use of the CPAP causing me to have to sleep and choke. In which will exacerbate my OSA and cause sleep deprivation increasing the risk of a break through seizure.

IV. Statement of Claim

D.

Page 5 of 11 continued

Xangut B. Kewin

17. Corrections Officer J. Rosario badge # 332 allowed inmates to turn the power outlet on and off for my CPAP even after alerting to it and as a result I could not use my CPAP and I was denied the use of my "DOJ" cleared therapy for severe sleep apnea.

IV. Statement of Claim

D.

18. Corrections Officer A. Rosario stated because you are the inmate and I am the CO, I don't care what you are saying. The switch is staying in this position and the power outlet can stay off. I don't care you're not using your breathing thing LOL." All after I stated "Ma'am, the outlet doesn't work and supply power to help me breath with the switch in that position, can't you use your flashlight other CO's?" Even showing the "DOJ" order that the DOC is supposed to follow. As a result Corrections Officer A. Rosario stated "What? and make me work harder?" I was denied medical therapy by CO A. Rosario for my serious medical need Diagnosed by St. Lukes Sleep Medicine Dr. Suneel Valla M.D., and as a result I had to sleep without my CPAP causing sleep deprivation, choking, exacerbation, and the chance of a break through seizure.

IV. Statement of Claim

D.

19. I had my disciplinary hearing with Ryan Keesler for the formal misconduct by CO Paganí. I asked Ryan Keesler to put a "Keep Separate" on another inmate because, of threats of assault after the inmate took a request slip I wrote from the CO's desk and told everyone I was a "Rat". I also informed Ryan Keesler about the problem with the power outlet in my cell getting shut off every time the switch is moved. I told Ryan Keesler about not getting showers and recreations 24/7 in my cell against inmate handbook policy. Ryan Keesler stated "I will have Horvath look into threats and watch it", which because he did nothing resulted in the inmate putting his hands on me, "I will have the outlet looked into by maintenance as soon as possible", but it was never fixed until 11/21/2024 by order of SGT. Jiminez to maintenance. As a result Ryan Keesler not caring about me and lying to me, I did 15 days 24/7 in my cell and as a result of me seeking redress in the Federal court which is my constitutionally protected right he has broken the 1st 8th and 14th Amendments in retaliation. All was witnessed verbatim by Corrections Officer Robert Micklich badge # 152.

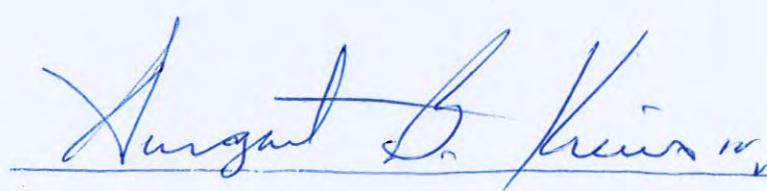
IV. Statement of Claim

D.

20. Corrections Officer A. Rosario was shift relief in the morning for 1st shift and on her initial head count she immediately shut off the power outlet to my "DOJ" ordered "Constant Positive Air Pressure" causing choking and she commented "Oh well you can't use that machine thing LOL". Denying me using my Therapy for serious medical needs prescribed by St. Lukes Sleep Medicine Dr. Suneel Valla M.D. for sleep deprivation, which leads to seizures, choking, and exacerbation.

IV. Statement of Claim

D,

Page 5 of 11 continued 

21. I was taken on a medical run to St. Lukes Neurology by the Northampton County Sheriffs. The PA-C for Dr. Chad Edward Saunders M.D. said "You must use your CPAP to lessen the chance of sleep deprivation causing break threw seizures. I will work on trying to get a new VNS magnet and it must be used during any episode. You must take your medication 12 hours apart and need to be on "medical observation" because, of risk of (SUDEP). Sheriff Craner is witness.

IV. Statement of Claim

D,

22. Corrections Officer Harrison badge # 553
witness of Bonnie Gleason coming to see me
cell side about me putting in multiple sick
calls and me never getting called to medical
for them. Bonnie Gleason stated "Kathleen A. Maher
called you but, you refused to go to medical."
I was never even asked and as a result of
me taken Northampton County Prison's medical departm-
ent to redress in the federal court which is consti-
tutionally protected now the medical care staff
just ignore me and my medical needs. Pending
case 21-CV-2360. RN Kathleen A. Maher continues to lie.

IV. Statement of Claim

D,

23. I gave a Primecare Medical Inc. grievance to LPN Peyton to alert DON Shane P. Caffery, PA-C Paulina Foley, and RN Lauren Tamburino that my medications are giving me bad headaches which can easily grow into full epileptic episodes and all three medical personal have been told by my medical specialist at st. Lukes Neurology about the needs for continued care of my serious medical needs. Dr. Chad E. Saunders M.D. has told Primecare Medical Inc via "AVS" multiple times the need for "medical observation" due to (SUDEP), the need for CPAP care, to avoid sleep deprivation leading to seizures, the use of my VNS implant to help control my epilepsy, 12 hour intervals for my medication, and the need for Brand Name Trileptal due to differences in generic and Brand Name. All three of these defendants listed above are in control and/or in charge of this at Northampton County Prison. Paulina Foley puts entries into your inmate care file of Primecare Medical Inc, and sets up medical runs, going over "AVS" returned by the specialist. DON Shane P. Caffery takes care of ordering medications in the Prison and the distribution of medications. Lauren Tamburino is the Medical Administrator to over see the proper inmate care in the Prison. All information is already known for my medical care in my Primecare Medical File "August Byron Kreis 2419-6383" but, as a result of me doing the constitutionally protected right to redress in the federal court pending case 21-cv-2360 now they don't care, ignoring me giving me inadequate care and placing my life in danger of SBI/Death.

* No Statement of Claim

* D.

24. Evening medication was given by RN Lauren Tamburino Medical Administrator. My Neurology specialist has informed PrimeCare Medical Inc. via "AVS" that my medication is time released and not to be crushed. This information is in my medical file but, despite this my medication was all crushed. Out of retaliation for the fact I went to the constitutionally protected right of redress in the federal court now my medical needs are ignored and I am lied to and given inadequate medical care for filling #1-CV-2360. Deliberate Indifference to my serious medical needs, Diagnosed by Dr. Chad Edward Saunders M.D of St. Lukes Neurology for sever Epilepsy

IV. Statement of Claim

D.

25. Corrections Officer Brittaney Dewalt badge #443 escorted Primecare Medical LPN Darcey Fritz and generic Trileptal was still being given. DON Shane P. Caffery told me weeks ago that he just had to reorder it. Against the specialist's recommendations for continued care of serious medical needs. All of Dr. Chad Edward Saunders orders from St. Lukes Neurology are in my inmate care file "2419-6383". Those orders threw "AVS" are just being ignored in retaliation for going to the constitutionally protected Right of redress in the Federal court 21-CV-2360, my life now being belittled and placed in danger of SBI/Death by inadequate medical care and deliberate indifference.

IV. Statement of Claim

D.

26. Corrections Officer Kayla Hernandez badge #
 457 watched distribution of morning medication and
 the entire specialist requirements for continued care of
 my serious medical needs is being ignored by DON Shane
 P. Caffery, PA-C Paulina Foley, and Medical Administrator Lauren
 Tamburino by generic Trileptal being still given when it is already
 in "August Byron Kreis 2419-6383", to give brand name only,
 "medical observation", "CPAP use", "VNS use". My life
 is being put in danger of (SUDEP) and/or
 SBI/Death for money saving and retaliation for bringing
 lawsuit in the Federal court which is constitutionally protected.

Pending case 21-CV-2368.

IV. Statement of Claim

D.

27. Corrections Officer Brittaney Dewalt badge # 443 called medical post 17 for tylenol for a severe headache, from medications being given, and corrections officer Lashia Ramos badge # 544 answered and denied me medical care stating "that asshole can wait till 3rd shift" causing me to suffer a painfull pointless severe headache.

IV. Statement of Claim

D,

28. Corrections Officer Zayas badge #326 stated "I just called medical and they told me they are short staffed and they are still working on the diabetics so they will come when they are done." Medication did not get brought till after 10:00pm due to inadequate medical care. DON Shane P. Caffery is director over the LPNs and RNs, and Lauren Tamburino oversees all of medical and both defendants failure to do what they are paid to, results in no structure to medical care. Above mentioned defendants just acknowledge and acquiesce medical staff's inappropriate actions. Leading to my civil rights violations.

IV. Statement of Claim

D.

29. Primecare Medical Inc. LPN Ivy brought evening medication with Corrections Officer Spaziani badge #552. It was confirmed for the second time that being on F Tier where Ryan Heesler placed me despite Dr. Chad Edward Saunders, of St. Lukes Neurology, order to be on "Medical Observation" as a result of risk of (SUDEP) was not followed because, PA-C Paulina Foley nor DON Shane P. Caffery placed me on "Medical Observation" as of my intake. LPN Ivy stated "E Tier "the Hole" nor F Tier are "Medical Observation." "You would be on H Tier or in the MHCI "Medical Housing Unit" near medical." All above named defendants; Ryan Heesler, Paulina Foley, Shane P. Caffery are doing this to me in retaliation for seeking redress in the Federal Court, Constitutionally protected and now my life is being placed in danger of my serious medical needs by deliberate indifference as a result of pending case 21-CV-2360X.

III. Statement of Claim

D,

Page 5 of 11 continued

Xangut B. Kewen

30. Corrections Officer J. Rosario badge #332 escorted LPN Ivy to deliver medication and I was given 2 generic 300mg Dark oblong Trileptal pills to substitute my brand name 600mg Trileptal pill. I stated "what is this?" LPN Ivy stated "We have no more of the 600 mg pills, they were not ordered." DON Shane P. Caffrey is in charge of medication ordering and he does not do his job totaling inadequate medical care, in retaliation of pending civil Rights suit 21-cv-2360 §1983.

IV. Statement of Claim

D.

31. Corrections Officer Robert Thoma badge # 497 refused to sign a request slip to the Lieutenant for an NCP-167 initial grievance. He stated "I want to know why you need it or I am not signing it because, it may not be grievable." Then he commented "I will send you to the hole if it is bullshit." I am putting in a 1st amendment protected speech of an inmate but, now I need to be in fear of retaliation by Officer Thoma and Ryan Keesler.

IV. Statement of Claim

D.

32. Corrections Officer Robert Thomas badge # 497
escorted Primecare Medical LPN Joan L. Kneas and
while receiving my medication I asked "Is this brand
name Trileptal?" LPN Joan L. Kneas stated "No it is not, I was
looking for it but, we don't have it. Are they not giving it to
you any more? This place is bad!" DON Shane P. Caffery
is in charge of reordering medication and PA-C Paulina
Foley enters orders into my file and Lauren Tamburino
over sees all medical staff stationed at Northampton
County Prison and all three named defendant's actions of not
ordering the right medication, keeping it in stock, enforcing its
need and giving proper "DOJ" orders for "medical observation"
and making sure I get adequate medical care is placing
my life in danger of SBI/Death do to (SUDEP) and it
was confirmed by Primecare's own staff that they lie to me.
These actions can also be attributed to me seeking my
constitutionally protected right to redress in the Federal
court pending case 21-CV-2360. A Primecare staff member's
knowing of a patient being abused but not doing anything is against

IV. Statement of Claim

D.

32 continued... Primecare Medical Inc's official policy made by corporate of verbatim "Any staff member who suspects potential abuse of a patient has the responsibility to contact the appropriate authorities, to include the PCM Corporate Office via the chain-of-command." This corrections facility of Northampton County is completely deviod of following the stated policy of PCM and I have told "ALL" levels of control/supervision/monitoring that I absolutely can and it is just ignored, acknowledged, and acquiesced placing my life in danger due to inadequate medical care, deliberate indifference to my serious medical needs diagnosed by Dr. Chad Edward Saunders M.D. of St. Lukes Neurology Associates and retaliation of pending case 21-CV-2360 CMR. Violating my 1st, 8th, and 14th Amend Rights.

IV. Statement of Claim

D.

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August B. Kresser

33. Primecare Medical Inc. has the policy established by corporate upon the "receiving screening" at Northampton County Prison to verbatim "It is the responsibility of Nurse and or the medical assistant completing the receiving screening to verify medications with the pharmacy or outside provider. This is documented on the medication Verification Form in CorEMR." "It is the responsibility of the nurse reviewing the screening to obtain orders from a provider for verified medications, and to ensure that all aspects of the receiving screening are complete and that key issues have been addressed. Verbal orders that are obtained from PCM providers are documented on a verbal order form in CorEMR" Upon intake Primecare Medical Inc. uses the above mentioned Corporate Policies, but upon verification they do not verify if an alternative which is lesser in price is a less efficacious treatment to your serious medical needs. These above mentioned corporate policies combined with the fact Primecare Medical Inc. has a policy of corporate as well to opt for a treatment that is lesser in price as can be seen by Primecare Medical Inc. corporate Policy verbatim "Patients entering the facility on perscription"

IV. Statement of Claim

D.

Page 5 of 11 continued

August B. Kruisiv

33 continued... medications and if clinically indicated, the medication is continued or an acceptable alternative is prescribed." In reference to claim 6 that the CPAP had to be "cleared" by corporate, this is because anything over the lesser alternative has to be "cleared" by the policy of corporate before being administered and as a result once the medication I came into Northampton County Prison with was used up, I was only given generic alternatives for a month and a half to two months until corporate "cleared" the ordering of the correctly prescribed "life sustaining anti convulsants" which caused "break through seizures" and put my life in danger of (SUDEP) Death, retardation, or paralysis in deliberate indifference to my serious medical needs diagnosed by St. Lukes Neurology Associates and continued care by Dr. Chad Edward Saunders M.D. "Neurologist" to avoid irreversible harm. All of claim 33 directly violating Plaintiff's 1st, 8th, and 14th Amendment Rights. 1st amendment do to retaliation for pending case 21-CV-2360 CMR, to constitutionally protected right to seek redress in the Federal Court §1983.

IV. Statement of Claim

D.

34. DON Shane P. Caffery came to see me cell side and stated "Can we talk about your medical -tion?" and ^{then} he stated "Ummon next week we will have your medication sorted out to be name brand specific." then he proceeded to say "How about tomorrow I will call you down to talk to you." The next day he never called me to medical. This whole conversation was witnessed by Officer Colva badge #534. DON Caffery had shown that he knows of his actions of not ordering his responsibility to brand name Trileptal for my serious medical needs, and adequate medical care while in custody. I sought redress in the Federal court as performing my constitutionally protected right, pending case 21-CV-2360, and now I am not receiving adequate medical care or the proper care for long term chronic care to a serious medical need which is leading to retaliation and deliberate indifference.

Dr. Chad Edwards Saunders M.D. St. Lukes Neurology "Med obs" "Brand name medication"

IV. Statement of Claim

D.

35. I reported to Corrections Officer Harrison badge # 553 that I had a nocturnal Seizure and LPN Iraida Candia - Romero was sent to F14 to take my base vitals. At 11:30am, while waiting for my "provider" to reply it progressed into a full epileptic episode and corrections Officer; officer Harrison badge #553 called a "Code Blue" medical emergency. I was taken via "striker chair" by corrections officer Tony Hampton badge #296 to the main medical exam room. Med. Adm. Lauren Tamburino commented "I wrote a (DOJ) order that he is to be placed on (medical observation). I was brought to cell H17 to be on a medical observation block, as a result of all 5 beds in the "medical Housing unit MHU" being full. I was eventually brought my belongings by CERT, Officer Anderson. Anderson later returned and stated "I have never heard anything like this, but pursuant to primecare Medical we are to put you back on F tier in cell F14." Once back on F Tier I had Corrections officers personally check and witness that the "OMS" (offenders Management System) stated verbatim "11/17/24 reason for assignment → • Med OBS on F tier per primecare entered by Spikes, Donell." I was in H17 truly on Medical Observation for a total of 2 hrs and 49 min.

IV. Statement of Claim

D.

Claim 35 continued. witnessed by Corrections officers Brittany Dewalt badge # 443 and Corrections Officer James Spaziani badge # 552 who both checked the "OMS" system for housing and/or DOJ orders for medical Observation. Medical Observation was placed in the computer, but I wasn't physically placed on it. Defendant DON Shane P. Caffery later at 4:45 pm came to F tier giving me a "DOJ" ordering that "must have a power outlet." I'm receiving inadequate medical care and deliberate indifference to a serious medical need placing my life in danger of SBI or Death (SUDEP) as a result of my § 1983 Filed as Constitutionally protected Right in May 2021. Some defendants in this complaint are defendants in pending case 21-CV-2360X. DON Shane P. Caffery also entered a detainer into the "OMS" system on me and he IS NOT Law enforcement, BUT he is a defendant in BOTH complaints.

IV. Statement of Claim

D.

— Under Penalty of Perjury

36. Corrections Officer Georgallis badge # 524 came onto the block and asked "Is Kreis supposed to be breathing like that?" and Corrections Officer S. Boyd badge # 502 stated "I don't know, and I don't give a crap. I'm reading my book". All was told to me by Officer Georgallis badge # 524. This showing deliberate indifference to not give medical care when it is even recognized by non medical staff but, Officer S. Boyd denied to give medical care. This situation also shows that F tier is not an observation block, the Corrections do not care. My "DOJ" order for a CPAP is on the block to notify any officer working of my serious medical needs and it is in my "OMS" file I am to be on "Medical observation" /

IV. Statement of Claim

D.

37. LPN Joan L. Kneas brought medication and I was given 2 generic 300mg Trileptal pills. I stated "What is going on with my meds Jodi?" and she stated "I don't know Kneas, they are not ordering it anymore." I also gave LPN Joan L. Kneas a Primecare grievance to take me to my specialist Neurologist after my "Code Blue" on 11/17/2024. But it was denied by Paulina Foley as "Not Necessary". With deliberate Indifference to my serious medical need diagnosed by Dr. Chad Edward Saunders M.D of St. Luke's Neurology needing continued care in which defendant Paulina Foley is well aware of. Violating my Rights.

IV. Statement of Claim

D.

38. I was taken via "striker chair" to the medical exam room when K. Davis badge # 549 called a "Code Blue" medical emergency, because I walked out of my cell when count cleared and immediately went into an epileptic episode by the officer's station by gripping the cart next to the podium and falling over to my right towards the ground. Another inmate caught me from slamming my head into the ground, before the CERT team and medical arrived on F Tier. Once in medical LPN Joan L. Kneas took my base line vitals and I was not monitored after the episode. CERT member Officer Cruz helped me walk back to F Tier once I could. Corrections Officer K. Davis badge # 549 did a full situational report and the "Code Blue" should all be on DOC camera recording. As a result of the Prumecare Medical Defendants giving the wrong medications and not being on "Medical Observation" pursuant to St. Lukes Neurology Dr. Chad E. Saunders MD orders for care of a chronic serious medical need out of inadequate medical care, deliberate indifference, and retaliation of my constitutionally protected Right to seek relief in the Federal Court for my prisoner Rights in 2021, 21-CV-2360, now my life is being placed in danger of SBI or Death, (SUDEP), "Sudden Unexpected Death in Epilepsy". I have had several "Code Blue" medical Emergencies and all that is done is take my "base line" vitals and place me back in my cell not being observed for atleast 24 hours to make sure there is no following "break threw" seizures (Epileptics), which will lead to death.

IV. Statement of Claim

D.

39. I was called to the medical exam room to speak with defendant PA-C Paulina Foley about the "Code Blue" medical Emergency called the previous day due to inadequate medical care because the medical care company Primecare and their workers in Northampton County Prison do not do their contracted jobs and Northampton County refuses to take responsibility for Medical actions and for inactions by stating "insurance" covers everything. Federal case law has already stated that, "just because a facility contracts out its medical inmate services to a third party that doesn't relieve the state of its responsibility to provide adequate medical care to those it wants to hold in custody." I am still NOT being given the correct medication for severe epilepsy control and in only one seizure I can die. The way this jail is treating me is in retaliation of me doing my Constitutional Right of seeking relief in the Federal Court for conditions in 2021 in the pending lawsuit of the Eastern District of Pennsylvania 21-CV-2367 Hon. Cynthia M. Rufe, J. I am afraid for my life.

IV. Statement of Claim

D.

40. First shift Corrections Officer Williams badge # 546 was on the block when DON Shane P. Caffery came to see me cell side and brought me one of my two VNS implant magnets and I stated "Can you please place the other one some where All medical staff can access it in an emergency." DON Shane P. Caffery stated "I will put it in the pharmacy for access if needed."

IV. Statement of Claim

D.

Page 5 of 11 continued

August B. Koenig

41. My first NCP-167 grievance "GRS" was given to me by block officer Spaziani badge # 552 diligently filed at 9:30 pm and placed in the grievance box on the housing unit for the "GRS" system.

IV. Statement of Claim

D.

Page 5 of 11 continued

Angela B. Kruis

42 CPN Ivy witnessed by Officer Spazzani badge #
552 distributed evening medication and I was
given the correct Trileptal inscribed TF/TF
on both ends of one side and oblong light
yellowish pink. As a result of inadequate
medical care and retaliation of filing previous
31983 I experienced multiple seizures in my
disability of Epilepsy of serious medical needs.
In which you can DIE from one seizure. I was
given the correct Trileptal finally but, the Vimpat was generic Lacosamide.

IV. Statement of Claim

D.

43. This claim is in refurance to claim number 42's actions of finally recieving a different medication other than the Generic Trileptal also known as Oxcarbazepine. This claim is also in refurance to claim 33 and the policy and custom of Primecare Medical Inc using generic medication to save money. "Corporate" has to finally approve of the use of a life sustaining medication which is already known to be known by Primecare Medical Inc as a necessity to sustain my life. This information is ALL in my medical chart, but is retaliation as a result of pending 8:1983 21-CV-2360.

IV. Statement of Claim

D.

44. Medication was just distributed by Primecare Medical Inc. LPN Irada while Correction Officer Lafragola was breaking F tier's block officer. I was given a dark yellow oblong pill inscribed with the numbers 139 and the letter G on the other side. This is the generic form of Trileptal also known as Oxcarbazepine. I asked LPN Irada "Did you have to just pour all these pills?" LPN Irada stated "Yes". Primecare Medical Inc. at Northampton County Prison is incompetent and I do not understand what the medical care people at this facility don't understand that you can NOT go medication to medication and not think that there will be no negative result. Putting my life in Danger of SBI or Death. My neurologist has told these people so many times of how the continued care of my serious medical needs. Dr. Chad Edward Saunders M.D. of St. Lukes Neurology has told them/Primecare (SUDEP), putting my life in danger as a result of severely inadequate medical care as a result of poor administration and retaliation as a result of my first §1983 filed in 2021 and served in 2023 which is my constitutionally protected Right.

IV. Statement of claim

D.

415. CPN Joan L. Kneas delivered medication with Corrections Officer Spaziani badge # 552 on F tier. The medication delivered was poured by LPN Darcey L. Fritz of primecare medical Inc. and I was given a generic 600 mg Trileptal Pill and a generic 150 mg Trileptal pill. I was told by LPN Joan L. Kneas that my neurology specialist upped my Trileptal dose from 600mg to 750mg because of the seizures "code Blue" medical emergencies that I have had, but I will testify and declare that these inmate medical care professionals do NOT tell the specialist that as a result of THEIR actions/inactions is why I have had seizures. I have a PA state DL. 28-292-711 and on the street in society I am fine to control my serious medical needs, then in here, they put my life in danger of SBI or Death, I am receiving inadequate medical care as a result of filing my §1983 in May of 2021 on this facility.

IV. Statement of claim

D.

46. DON Shane P. Caffery came onto F tier to distribute morning medication, and I spoke to him about the incident that occurred the evening before. I explained to him how LPN Darcey L. Fritz of Primecare Medical Inc. gave me, through pouring the medication, the wrong medication for my chronic epilepsy and the jail has been told via "AVS" communication and phone calls numerous times how serious my medical needs are and the specialists recommendations for them to treat my serious medical needs. They were told that I am at risk of the medical term (SUDEP) meaning "Sudden Unexpected Death in Epilepsy". Meaning, in ONE seizure I could die. This conversation was all heard by Corrections Officer Feris badge #457. DON Shane P. Caffery acknowledged the inaducie of the medical care by stating "Not that that is any excuse for what she did".

IV. Statement of Claim

D.

46 continued. I was diagnosed with epilepsy at 13 years old by St. Lukes Neurology, and they have been taking care of me since. A total of 24 years. All records are with their office. My current Neurology Specialist Dr. Chad E. Saunders M.D. has explained ALL needs for my medical needs so I don't lose my life in this facility, but motivated by spite and retaliation of me filing my § 1983 in the year 2021 21-CV-2360, this medical care company in Northampton County Prison is choosing to do actions that put my life in danger of SRI or Death. DON Shane P. Caffery acknowledged and acquiesced the actions of LPN Darcey L. Fritz because it happened more.

IV. Statement of Claim

D.

Page 5 of 11 continued

Angela B. Kresser

47. LPN Darcey L. Fritz came onto F tier and threw a Primecare Medical Inc. grievance at me stating "Here is another fucking grievance so you can write me up again fucking asshole." In front of Corrections Officer Spaziani badge #552. LPN Darcey L. Fritz is completely disrespectful and out of control doing what she wants not monitored by RN Lauren Tamburino or DON Shane P. Caffery. She does not get monitored nor admonished by the corporation of Primecare and she has put my life in danger of SBI or death multiple times because of retaliation and spite of my pending §1983 21-CV-236(X), her dislike of me as an inmate and carelessness to the value of human life.

IV. Statement of claim

D.

Page 5 of 11 continued

Margaret B. Farrow

48. CPW Bonnie Cileson delivered morning medication with Corrections Officer Harrison badge # 553 escorting and out of retaliation for me filing a 42 USC §1983 in 2021 pending 21-CV-2360, giving me inadequate medical care out of spite. St. Luke's Neurology Dr. Chad E. Saunders M.D. has told them proper continued care of a chronic serious medical need that St. Luke's Neurology diagnosed. I was given generic medication and Primecare Medical Inc. at Northampton County Prison has been told exactly what care is needed to avoid SBI or Death, but the DON shale P. Caffery is incharge of ordering medications continues to ignore my neurologist recommendations placing my life in danger of SBI or Death, and Lauren Tamburino is the Med. Administrator who is supposed to enforce structure to medical care as a whole. In result of all listed defendants together not doing their jobs my life is being put in danger of SBI or Death.

IV. Statement of Claim

D.

Page 5 of 11 continued

August B. Lewis

49. Classification specialist Martin Sylvan came to speak to me on F tier about the grievance I placed on the 4th of December 2024 about the actions of Ryan Keesler threatening to assault me and put me on E Tier in "The Hole" on administrative segregation if I put in any request slips or grievances also asking "so you have been trying to sue us for years asshole, how is that working for you?" As a result of me not opting to place myself "PC" in "The Hole", the grievance "GRS" was denied even to appeal and I assume they are able to threaten your life.

IV. Statement of Claim

D.

50. I was given generic medication against the care for diagnosis for a chronic special medical need that, improper care will lead to SBI or death. St. Lukes Neurology diagnosed my serious medical need at 13 years old and only one seizure can kill me or leave me permanently brain dead.

Dr. Chad E. Saunders M.D. has communicated with Northampton County Prison's medical care by Primecare Medical Inc., but they do NOT follow it, Donald P. Caffery does not keep my life sustaining anti convulsant in stock and/or order brand name as required as continued care required and Lauren Tamburino does not enforce proper medical care within the jail. Which lets Primecare save money using generic medications. All defendants listed are in my §1983 that was filed in May 2021. 21-CV-2360 in which causes these actions of retaliation and inadequate medical care. I tell the supervisors over and over, they acknowledge and acquiesce.

IV. Statement of Claim

D.

51. It was discovered by mother in Myrtle Beach, SC, a retired RN of over 36 years and through Corrections Officer Spaziano's badge # 552 searching the internet that the 600mg Trileptal pill and the newly prescribed 150mg Trileptal pill are generic oxcarbazepine. The 600mg pill yellow inscribed "139" reverse side "G" and the 150mg inscribed "137" reverse side "G" are made by a company called Glenmark Generics Inc. 750 Corporate Drive Mahwah, NJ 07430 "corporate number (201) 684-8000". I have also been given another generic form of Trileptal 150mg, small orange inscribed B2/98, which was confirmed generic by my mother RN of over 36 years. Primecare Medical is continuing to violate my rights of adequate medical care even though my Neurologist from St. Lukes Neurology, Specialist Dr. Chad E. Saunders M.D. made it clear to primecare medical Inc. This time

IV. Statement of claim

D.

51 continued. I have been incarcerated and last time I was incarcerated when filing my pending §1983 Civil Action No. 21-CV-23607, that it MUST be brand name Trileptal for multiple reasons for continued care of my serious medical needs. The actions of the named medical defendants of retaliation because, of my pending §1983 upon primecare defendants and inadequate medical care as a result of DON Shane P. Caffery not monitoring the medication being dispensed by the LPNs or his lack of ordering the correct medication which is his responsibility, and lastly DON Shane P. Caffery does NOT monitor that the PROPER pills are filled and dispensed by the LPN and/or RN staff and complaints to him as the Director of Nursing have been ignored and the LPNs & RNs continue to be improper placing me at risk of SUDEP, S.B.I or Death. Lauren Tamburino defendant to the primecare Medical Inc. company is the Medical Administrator who goes over grievances and she has been told of the medical care workers actions, but she continues to allow it to happen.

IV. Statement of Claim

D,

52. Corrections Officer Jackson monitored morning medication distribution by LPN Bonnie Gleason and "All" medication was generic against Neurology specialists recommended instructions for continued care of my chronic severe epilepsy. Paulina Foley has been told via "AVS" and phone/Fax communication with my provider that treatment is necessary for my serious medical need and what that treatment is. I have also brought it to the medical staff at Northampton County Prison that I am not getting the correct treatment necessary and they continue to deny, and that prescribed treatment is not given. These actions are known to Shane P. Caffery the Director of Nursing who is in charge of the distribution of my life sustaining medication and the LPNs directly. Medical Administrator Lauren Tamburino who is responsible for going over grievances and to keep

IV. Statement of Claim

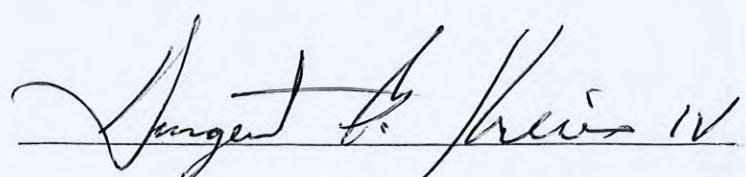
D.

52 continued. structure to the medical care of all inmates of this facility, but she continues to ignore my requests and continues to allow all medical staff to not give me proper care which puts my life in danger of SBI or Death by (SUDEP). LPN Bonnie Gleason did not give me proper care known by medical by Dr. Chad E. Saunders M.D. not just by her own choice and no care about the proper care known to staff, but I also brought a Title 42 USC § 1983 against this facility and inadequate medical care in May 2021. Pending case 21-cv-023-60 Cynthia M. Rufe, T. Bringing retaliation.

IV. Statement of Claim

D.

Page 5 of 11 continued

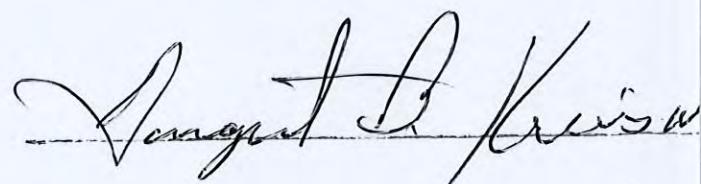


53. LPN Bonnie Gleason gave the morning medication which was the wrong medication against specialist/provider continued care and/or therapy again - Purposely denying necessary treatment for no reason besides inadequate medical care due to not caring because of my §1983 in May 2021 pending 20-CV-2360, and all named defendants were here in the facility at the time of that §1983 and also the allowance of the inmate ^{medical care} to act in this way even after being made aware of the danger it poses to my life and the pain it causes. Telling the DON Shane P. Caffery and Medical Admin. Lauren Tamburino.

IV. Statement of Claim

D.

Page 5 of 11 continued



54. LPN Irada Candia - Romeo dispensed medication, with Corrections officer Jackson watching and despite doing 2½ years in this facility 11/9/2020 – 02/15/2023 and asking numerous times about the needs for continued care the above named defendant still put my life in danger of SBI or Death by (SUDEP), because of the wrong treatment being given. Epilepsy is very delicate and dangerous, but despite the knowledge of this by Primecare Medical Inc at Northampton County Prison told by my specialist/provider Dr. Chad E. Saunders of St. Lukes Neurology LPN Irada continues to ignore and deny proper treatment, Giving me the wrong Trileptal and Vimpat.

IV. Statement of Claim

D,

55. Corrections Officer Harrison badge #
553 monitored morning medication distribution and defendant LPN Irada Candia - Romero continues to deny me proper prescribed treatment for my chronic serious medical needs by not giving me the correct medication prescribed by my specialist and/or prescriber Dr. Chad E. Saunders M.D. by St.Lukes Neurology. I have made defendant Med Administrator Lauren Tamburino known asking for the correct care numerous times by grievance and DON Shane P. Caffery but it is denied to me. I have been receiving inadequate medical care since intake of 8/24/2024 after my first §1983 in the Federal court in May of 2021. pending case 21-CV-2360. Multiple medical defens named in this complaint are in that complaint as well. The defendants actions are acknowledged and acquiesced.

IV. Statement of Claim
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28. USC 87446

I Declare (or certify, verify, or state) under
Penalty of Perjury that the foregoing
is true and correct. Executed on 12/18/2024
August B. Kueis II

• Letter to the Director OF Corrections about
medical conditions on F tier and PREA,

Claim 56 exhibit A

Inmate Rodger Keretz was just taken off this block, because of MRSA on his face and went from F tier to H13 to be placed on "medical Isolation". Rodger Keretz told Primecare Medical Inc, numerous times about the infection on his face and all they stated is (it was a pimple) until NO LONGER could the under staffed and trained medical in this facility could deny it. Inmate Rolland Hammell that I called PREA on and nothing was done is now going around rubbing the "scabs" and "pimples", which is exactly what Primecare Medical Inc, told Rodger Keretz he had, and he is touching everthing on this block. This is placing my life and Everyone elses in danger here. As I said, Nothing was done about

RREA being ignored is one thing now
guidelines of the CDC also being ignored
is crazy. Please enforce guidelines for
safety. LPN Bonnie Gleason of Primacare
Medical Inc. just looked at his neck and
stated "it is closed scabs". Then she walked
out and stated "oh my God what the F*ck ever."
I will say this is All recorded. All of ~~our~~
lives are being put in danger. 11:15pm
I'm writing this. Lt. Michael Chlebroski
said he never was told of anything of me
calling PREA on 12/13/2024 app. 11:15 am.

Respectfully,
Angie B. [Signature]

CC.

*Page 2 of 2

56. I called PREA about the inappropriate actions of another inmate touching me and comments made to another younger county inmate by the same inmate that had touched me previously. The inmate stated "Is there anyone else to Fuck besides this one little boy here?" The Northampton County Prison shift supervisors that were here at the time were Lt. Michael Chiebrowski, Lt. Oliver Larocco, and SGT. Brad Nicholas. Nothing was done about the request slip I placed or the PREA phone call on the other inmate and this is do to retaliation by Northampton County Prison being brought to the Federal Court to seek redress for prison conditions by following my constitution right to file a Title 42 USC §1983 violation of Constitutional Rights. Filed with the clerk's office May 2021 pending case 21-cv-2360.

IV. Statement of Claim

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PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 12/13/2024
 Date of Birth: 02/01/1988 Location: F14

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
 A response will be given within 3 business days of receipt.

I requested medical assistance to CO James Spaziani badge 552 and when he called for me prior inmate # 0015677 LPN Dorcey L. Fritz stated "We can't stop a seizure so if he has one just call a Code Blue." Paying no attention to what

Solution Requested:

the CO said about me using my VNS magnet and a severe headache and all was asked for was Tylenol. The comment about not able to do anything is not entirely true, please give proper medication and continued care.

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

.....
DO NOT WRITE BELOW THIS LINE
.....**SOLUTIONS/RECOMMENDATIONS**Date Received: _____ Date Forwarded: 1/13/25

RESPONSE: Tylenol is not provided on an emergent basis.

Health Services Administrator: J. Tambini PWI HSA

INMATE APPEAL: _____ I do wish to appeal _____ I do not wish to appeal

Cc: (Check all that apply)

Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

 Grievance File

PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis W Date: 12/13/2024Date of Birth: 02/01/1988 Location: F14**GRIEVANCE** (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
A response will be given within 3 business days of receipt.

I requested medical assistance to CO James Spaziani badge 552 and when he called for me prior inmate # 0015677 LPN Durcey L. Fritz stated "We can't stop a seizure so if he has one just call a Code Blue." Paying no attention to what

Solution Requested:

the CO said about me using my VNS magnet and a severe headache and all was asked for was Tylenol. The comment about not able to do anything is not entirely true, please give proper medication and continued care.

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator......
DO NOT WRITE BELOW THIS LINE
.....**SOLUTIONS/RECOMMENDATIONS**

Date Received: _____ Date Forwarded: _____

RESPONSE:

Health Services Administrator: _____

INMATE APPEAL: _____ I do wish to appeal _____ I do not wish to appeal

Cc: (Check all that apply)

- Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

 Grievance File

57. I asked to the block officer James Spaziani badge # 552 and had him call medical, because I had a severe headache and I had to swipe my VNS magnet once and was in severe pain. It felt to be an aura to an epileptic episode. When the F tier officer called medical LPN Darcey L. Fritz stated "We can't do anything to stop a seizure to bad, if he goes into a seizure call a code Blue." My request for tylenol was relayed and ignored. The actions of Darcey L. Fritz of denial of proper and/or adequate medical care are in retaliation of me filing my Title 42 USC §1983 in May 2021 pursuant to constitutional Right. Pending case 21-CV-2360 Hon. Cynthia M. Lufe, J.

IV. Statement of Claim

D.

58. Officer Harrison watched over LPN Bonnie Gleason distribute morning medication and all of my "Namebrand Specific" Life Sustaining anti convulsants were generic against recommended continued care for my serious medical needs of severe epilepsy diagnosed by St. Lukes Neurology. I am suffering SEVERE retaliation being in this facility again after placing my §1983 seeking redress in the Federal Court our Constitutional Right in May 2021. Bonnie Gleason worked here at that time as well. Now leading to all of the defendants placing my life in danger of SBI of epileptic episode or death (SUDEP). Wholly inadequate medical care

IV. Statement of Claim

D.

59. Officer Mieszell watched over LPN Joan L. Ihneas as she distributed evening medication on F Tier and even as a Primecare Medical Inc. employee herself she stated "Your Namebrand specific medications are in medical, they just don't do their jobs or give a shit."

IV. Statement of Claim

D.

60. Corrections Officer Harrison watched over LPN Bonnie Gleason and she administered all generic anti convulsants instead of my (Name Brand specific) Trileptal for my action of filing my §1983 in the Federal court pursuant to my constitutional rights. Pending lawsuit #1-CV-2360 filed May 2021. Leading to inadequate medical care and my life being put in danger of SBI or Death.

IV. Statement of claim

D

61. Corrections Officer Harrison badge #553 witnessed me talk to Lt. Michael Chiebrowski who was in the supervisor's office at the time I called PREA on inmate "Roland Hammell" about touching me and inappropriate sexual comments to another inmate and LT. Michael Chiebrowski stated "That is odd... Hmmm.... I never got a call I will have to look into that, I will get back to you." I talked to Corrections officer James Spaziani badge #552 and he confirmed that when Officer Harrison badge #553 took my statement and the other inmates ~~for~~ a situational report LT. Michael Chiebrowski was here. All PREA calls should be recorded and this place did nothing. As a result of retaliation of seeking redress in the Federal Court by Constitutional Right then being brought back into custody during my §1983 21-CV-2368 I am suffering severe emotional and medical suffering.

62. Corrections Officer S. Jackson badge
338 watched over LPN Iraida Candia -
Romero of Primecare Medical Inc. gave me all
generic anti convulsants instead of my
(Namebrand Specific) medication in retaliation
of me seeking relief in the Federal Court
pursuant to Constitutional Right by §1983 and
~~she is~~ now giving me wholly inadequate medical
care. Placing my life in danger of SBI or
Death (SUDEP). Explained by Dr. Chad Edward
Saunders M.D. for continued care/therapy for
continued/chronic serious medical needs. Violating
my Right to adequate medical care 8th Amendment
and in violation of my 1st Amendment Right.

IV. Statement of Claim

D.

63. Corrections Officer James Spaziani
 badge # 552 watched over Primecare Medical Inc. LPN Ivy give evening medication and AGAIN was given the Generic medication Oxcarbazepine made by Glenmark Generics Inc. Mahwah, NJ. My medications being wrong against Dr. Chad Edward Saunders M.D. of St. Lukes Neurology for continued care for my serious medical needs. Continuing to violate My 1st Amendment rights out of retaliation for my § 1983 filed pending in front of Hon. Cynthia M. Rufe, J. 21-CV-2360. Constitutionally Protected and now I'm suffering inadequate medical care and the Administration also acts in retaliation acting of not caring about my safety.

IV. Statement of Claim

D.

64. Corrections officer Harrison bage # 553
 over watched medication given by LPN Bonnie Gleason
 and all of my life sustaining anti convulsants
 prescribed by my specialist Dr. Chad Edward Saunders
 M.D. from St. Lukes Neurology as (Brand Name
 Specific) are not given as brand name. As a
 requirement for continued care of my serious
 medical needs for epilepsy. The ONLY Primecare
 Medical Inc. LPN that gives it to me correctly
 is Joan L. Kneas. She also confirmed it to me
 over this past weekend that "it is in the
 pharmacy room and these individuals don't care."
 DON. Shane P. Caffrey wont have to pay to reorder
 it, because it is barely given. The actions of this
 medical care team in Northampton County Jail are
 a result of a lack of supervision/admonishment and
 retaliation for me using my Constitutional Right to seek redress
 in the Federal Court in 2021. Pending Case 21-CV-2360.
 Now my life is being placed in danger of SBI or death,
 it only takes one seizure to die.

IV. Statement of Claim

D.

65. Corrections Officer Harrison badge # 553 was working when Lt. Michael Chiebrowski came onto F-Tier to sign in and/or off for that current shift and with officer Harrison badge # 553 as witness I speak with Lt. Michael Chiebrowski and I asked him "So did you find anything out about the PREA I called?" and Lt. Michael Chiebrowski stated "I only know what SGT. Harring said and he stated that he knew nothing about it." It was confirmed by 2nd shift officer James Spaziani badge # 552 that all of the shift supervisors that allegedly knew nothing about the (non tolerance PREA) call I made on 12/13/2024 around 11:15 am, which should be recorded, and NO ONE did anything about it. I had serious emotional distress because of nothing being done out of retaliation of me seeking redress in the Federal Court on on this facility in 2021 in May, when I filed the pending 31983 21-CV-23608 Hon. Cynthia M. Rufe, J.

IV. Statement of Claim

D.

66. Corrections Officer Leah sent me down to the medical Exam room to see a new medical employee about my neurology disorder and I explained how after receiving my medication, and it being the wrong one, I keep getting headaches and dizziness. She also took my blood pressure stated "Your blood pressure is high so I will be checking it more." Defendant Jenn Keller from pending §1983 from 2021 21-CV-2360 was also in the room.

IV. Statement of Claim

D,

67 Corrections Officer Harrison Badge # 553 was watching LPN Iraida Candia - Romero give medications on F Tier and my "life sustaining" anti convulsant Trileptal and Vimpat were generic. Even though my prescriber DR. Chad Edward Saunders M.D. of St. Lukes Neurology have told Primecare Medical that for continued care of my serious medical needs of severe epilepsy it is required or I can loose my life. (SUDEP) As a result of retaliation of my first constitutional right to seek redress in the Federal Court in 2021 pending case 21-CV-2360 now I receive inadequate medical care, SBI or Death, Severe headaches, dizziness and "Code Blue" multiple times I could die from epileptic episodes.

IV. Statement of Claim

D.

68. Corrections Officer Harrison badge # 553 was watching over CPN Darcey L. Fritz give medications of Primecare Medical Inc. on F tier and one of my (Brand Name Specific) "life sustaining anti convulsants" were generic and my prescriber from St. Lukes Neurology, Dr. Chad Edward Saunders M.D., has told Primecare Medical Inc. at Northampton County Jail many times that the prescribed care for my serious medical needs MUST be followed. They were told at Northampton county Jail that I am at risk to die and (SUDEP). All prescribed treatment is to be followed. Primecare Medical Inc. at Northampton County Jail lies to my specialist about the care being given. There is an exhibit attached to claim 68 about the lies told. A blood work done and Primecare Medical Inc at the Northampton County Jail saying I don't need to see the doctor even though I have had seizures, because my blood levels are within acceptable limits. Even though they lie and don't tell the Dr., Dr. Chad Edward Saunders M.D. that they are not the right medications. It is a coincidence that when I am not in here, Northampton County Jail, as an example; February 15th 2023 to August 24th 2024, I have no problems with my seizures and I have a PA drivers license but, as soon as I have to rely on Primecare Medical Inc. for medical care I have problems. As a result of my pending 31983 of 2021 21-CV-2360 in which I filed under my constitutional Right to seek redress by the Federal Court I am suffering retaliation and I'm afraid for my life by receiving inadequate medical care.

IV. Statement of Claim

D,



COUNTY OF NORTHAMPTON

DEPARTMENT OF CORRECTIONS

666 WALNUT STREET
EASTON, PENNSYLVANIA 18042

To: Inmate Kreis, August #0005264 (F-14)

From: Public Safety Administrator, David C. Collins, Sr. 

Date: Thursday 19 Dec 2024

Subject: Inmate Letter/Letter of concerns and complaints

Mr. Kreis,

I have received your most recent slip/letter/tablet correspondence. The concerns and your complaints within your recently submitted letter have been duly noted, and your letter has been forwarded to the Director of the Department of Corrections.

Thank you,

PSA D. Collins



67. I received a response from "Public Safety Administrator, David C. Collins, Sr." about the letter I wrote to the "Director of Corrections, Michael Pittaro" on the 18th day of December. I wrote the letter to the Director of Corrections the day before on the 18th of December and that letter is proof they got it the next day on the 19th of December. A verbatim copy is in with the complaint under 28 USC § 1746 and the letter sent to me today is with it. I explained how nothing was done about the PREA call on 12/13/2024 and the violation of CDC about MRSA asking administration of Northampton County Jail to do something.

IV. Statement of Claim

D.

70. Corrections Officer Harrison badge # 553 was working F tier when Primecare Medical Inc. LPN Liasha distributed medication giving me generic medications for my chronic medications condition for epilepsy not listening Dr. Chad Edward Saunders M.D. of St. Lukes Neurology directions for continued care of serious medical needs. All of the medical staff in the facility of Northampton County Jail do not get monitored or admonished by the individuals in the positions to do so. Lauren Tamburino as the Medical Administrator is supposed to monitor ALL medical staff and DON Shane P. Caffery is in the position to monitor/admonish all of the medical staff giving medications and he ABSOLUTELY does not. These medical staff do whatever they want, placing me in danger of SBI or Death. LPN Liasha in training just gave me all of the wrong medication. Primecare rented a CPAP this time in this which just proves last time in this facility they could have resulting in Pending in case 21-CV-2360. Everything this facility is doing is in retaliation of going to the Federal Court for redress by constitutional Right which is now ending up in inadequate medical care and the endangerment of my life, (SUDEP)

IV. Statement of Claim

D.

71. Corrections Officer Polanco escorted Primecare Medical Inc. LPN Iraida Candia-Romero giving medication on F tier and she continued to give me the wrong "life sustaining anti convulsant" medication. As a result of me exercising my constitutional Rights and me filing pending civil Action No. 21-CV-2360 in 2021.

LPN Iraida was working at the jail and is still working here now. As a result of me placing medical care under litigation by constitutional Right now the medical defendants listed are giving me inadequate medical care in deliberate indifference to my serious medical needs. Which is fully motivated by retaliation. I have my Full Primecare Medical Inc. inmate medical file given to me in the begining of September, after being brought back into custody at Northampton County Prison on 8/24/2024, it was sent to me by John R. Ninosky, Esq. as part of "Primecare Medical Defendants" Rule 26 initial Disclosures to my pending case 21-CV-2360. It states in Full the seriousness of my medical needs, the diagnosing doctor, the medical requirements for continued care and how what they are doing to me is putting my life in danger of Death.

IV. Statement of Claim

D.

Cell No. F14 Department of Corrections Inmate Request

Date: 12/23/2024

I specifically request: May I please get a grievance about
the actions of our officer.

August B. Kress IV

0005264

Inmate Perm Number

Block Officer Reply:

M. Evans #326

Officer's Name/ Badge No. (Print)

Forward to:

- Director
- Warden
- Treatment
- Classification
- Records
- Lt.
- CCF
- Inmate Accounts
- Profess. Responsibility
- Operations
- Pre-trial / Probation
- Pub. Def.
- Med

- Claim #2 Exhibit A

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE August B. Kreis DATE / FECHA 12/23/2024

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 0005264

DATE OF BIRTH / FECHA DE NACIMIENTO 02/01/1988

(UNIT / CELL) / (UNIDAD / CELULA) F14

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD I woke up on
the floor last night and I was allegedly
placed on medical observation pursuant to
primecare but, last night I woke up on
the floor and the CD was immersed
in watching "Modern Family". How am

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: _____

RESPONSE: _____

(SIGNATURE)

(DATE)

I am on any form of medical Observation
if the COs don't care if you die?

Now I am going to tell all
of them I have they had ~~to~~ all
the time no shave no beard
no hair I tape ~~ed~~ all shaving
material and it will have ~~to~~ all
the hair & ~~shave~~ ^{shaved} points.

- Claim 72 exhibit B

cc

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE August B. Kreis DATE / FECHA 12/23/2024

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 005264

DATE OF BIRTH / FECHA DE NACIMIENTO 02/01/1988

(UNIT / CELL) / (UNIDAD / CELULA) F14

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD I had a
nocturnal seizure at approximately
1:00 am and the CO did not
respond to me trying to report
my medical problem. May I please
see my neurologist, & get Triple anti

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: _____

RESPONSE: _____

_____ (SIGNATURE)

_____ (DATE)

biotic cream for abrasions, TY.

Claim 72 Exhibit C

Cell No. F14 Department of Corrections Inmate Request
 Date: 12/23/2024

I specifically request: To be sent to see my Neurologist after having a nocturnal seizure at app. 1:00am and the "code Blue" med emergency in November and December 1st,

August B. Kreis

0005264

Inmate Name (Print)

Inmate Perm Number

Block Officer Reply:

Official Use Only

S Jackson / 328

Officer's Name/ Badge No. (Print)

Forward to:

- Director Warden Treatment Classification Records Lt. CCF
- Inmate Accounts Profess. Responsibility Operations Pre-trial / Probation Pub. Def. Med

Claim 72. Exhibit D.

Cell No. <u>HM</u>	Debtors name <u>Gloucestershire Budget</u>
Date: <u>10/09/2023</u>	Address <u>100 High Street, Gloucester GL1 1AB</u>
Block Office Ref#: <u>58</u>	Block Name <u>High Street</u>
Office Type/Off: <u>Office</u>	Block House Number <u>1</u>
Landlord <input type="checkbox"/>	Block Description <u>Ground floor office</u>
Owner <input type="checkbox"/>	Building <input type="checkbox"/>
Debt <input type="checkbox"/>	Business <input type="checkbox"/>
Public <input type="checkbox"/>	Residential <input type="checkbox"/>
Private <input type="checkbox"/>	Commercial <input type="checkbox"/>
Other <input type="checkbox"/>	Industrial <input type="checkbox"/>
Occupants Name <u>Gloucestershire Budget Ltd</u>	
Address <u>100 High Street, Gloucester GL1 1AB</u>	
Postcode <u>GL1 1AB</u>	
Phone No. <u>01452 520000</u>	
Email Address <u>info@gbudget.co.uk</u>	
Mobile No. <u>07700 999999</u>	
Fax No. <u>01452 520000</u>	
Other <u>None</u>	
Comments <u>None</u>	

72. I woke up on the floor with abrasions and a bump on my head and I tryed to get the Correction Officer's attention at the CO's station adjacent to my cell "F14" and with his back to me Officer Scott badge # 543 was watching "Modern Family" and talking on the phone. After banging on the glass I was not responded to. I notified medical of what happened and I asked how I am on "medical observation" at all when the COs stationed on this unit pay no attention to you. Pursuant to Dr. Chad Edward Saunders MD and St. Lukes Neurology, I am to be monitored because I am at a high risk of (SUDEP). After the "Code Blue" of December 1st I was allegedly placed on "Medical Observation", but pursuant to primecare I was placed right back from H17 to F14. It was changed in the computer by DON. Shane P. Caffery and Medical Administrator Lauren Tamburino that I am on "medical observation F tier pursuant to primecare", which is NOT even possible. Medical Observation has to be H tier OR the Medical Housing Unit, but due to inadequate medical care in Northampton County Prison, the MHU only has (5) five beds. All others are on H tier.

IV. Statement of Claim

D.

Claim 72 continued. In an act of retaliation for me using my constitutionally Protected right to seek redress in the Federal Court about my prison/housing conditions in May of 2021 by filing pending case 21-CV-2360, now the same exact actions are being done to me. The actions of the Correctional and Medical persons/Defendants are going completely against the designated continued treatment of my Chronic serious medical needs, by Paulina Foley, Lauren Tambirino, DON Shane P. Caffery never placing me on "Medical Observation" pursuant to Allysa Bussell CRNP or Dr. Chad Edward Saunders M.D. of St.Lukes Neurology who told Primecare it was necessary for proper continued care of my serious medical needs, because of (SUDEP). "Sudden Unexpected Death in Epilepsy" ALL of the medical Defendants named above were here during the initiation and service by the US Marshalls of pending lawsuit 21-CV-2360, and are now placing my life at risk of SBE or death. I also state/Declare to the court I AM AFRAID FOR MY LIFE, Due to inadequate medical care for my serious needs.

IV. Statement of Claim

D.

• See attached Exhibits

Under Penalty of Perjury

73. Primecare Medical Inc. Kathleen A. Mahr
 came to F tier where my housing cell is "F14" and stated "I'm here to see Kreis's (Boo Boos) that he put in a sick call for the unwitnessed seizure activity." That was from the prior incident/claim that Corrections Officer Scott paid No attention to me trying to get his attention for the fact I woke up on the floor at 1:00 am, because he was watching TV and talking on the phone. Totally against my prescriber/specialist's recommendations for continued care that I am to be on "Medical Observation" in the MHU, but I'm not on medical observation due to (2) two reasons, one is retaliation to my previous Constitutional Right to file pending 5:1983 5:21-cv-02360 resulting in inadequate medical care and not caring about my life. Also Northampton County Prison has inadequate medical care housing in total. The "Medical Housing Unit" only has 5 beds for all inmates housed by the State. Kathleen A. Maher stated "They are just cuts." I stated that I know you can't stop the nocturnal seizure now, can I please get the triple Anti biotic ointment to close the ~~wounds~~ wounds? Kathleen A. Mahr stated "Yeah Yeah Yeah I'll take care of it." Primecare Medical Inc in NCP lies to Dr. Chad Edward Saunders M.D.

IV. Statement of Claim

D.

Claim74

August Krais
F:14

exhibit of exhaustion of remedies

&

example of inadequate medical care.

Ім'я і прізвище	45085051
Іванова Ольга Іванівна	Іванова Ольга Іванівна Задовільної медичної допомоги не отримала, але відмінної та надійної не отримала.
Лікар зробив сеанс то	Допомога розглянута як відмінна та надійна

Відповідь на питання про те чи відповідає це:

Відповідь на питання про те чи відповідає це:

Іванова Ольга Іванівна	<input checked="" type="radio"/> відповідає <input type="radio"/> не відповідає <input type="radio"/> не знаю <input type="radio"/> не відповідає
Однією з причин	45085051

45085051-0005485

Іванова Ольга Іванівна

зарахув

дію міжнародних

Іванова
Ольга
Іванівна
45085051-0005485
Іванова Ольга Іванівна

Patient Follow up Sheet

AUGUST BYRON KREIS
#2024-0002152

JMS ID: 0005264 Location: WORKER : F : 14 : A
 SSN: [REDACTED] Date Created: 12/09/2024 1024
 DOB: 02/01/1988 Last Saved: 12/09/2024 1024
 Age: 36
 Height: 5ft 6in

Date Of Service		12/23/2024								
Service Type	<input checked="" type="radio"/> Lab <input type="radio"/> X-Ray <input type="radio"/> EKG <input type="radio"/> Intake Testing									
<p>Your recent test(s) results performed by the Medical Department have been reviewed by the Medical Provider. The Provider has determined that:</p> <table border="1"> <tr> <td></td> <td><input type="checkbox"/> You have been scheduled for a follow up visit which should occur on</td> </tr> <tr> <td></td> <td><input checked="" type="checkbox"/> The results are considered within normal ranges, no further visits are required. If you continue to have any concerns/issues please resubmit a sick call request.</td> </tr> <tr> <td></td> <td>Paulina Foley PA-C</td> </tr> <tr> <td></td> <td>12/09/2024</td> </tr> </table>				<input type="checkbox"/> You have been scheduled for a follow up visit which should occur on		<input checked="" type="checkbox"/> The results are considered within normal ranges, no further visits are required. If you continue to have any concerns/issues please resubmit a sick call request.		Paulina Foley PA-C		12/09/2024
	<input type="checkbox"/> You have been scheduled for a follow up visit which should occur on									
	<input checked="" type="checkbox"/> The results are considered within normal ranges, no further visits are required. If you continue to have any concerns/issues please resubmit a sick call request.									
	Paulina Foley PA-C									
	12/09/2024									

74. Corrections Officer Hartison badge # 553 monitored Primecare Medical Inc. Kathleen A. Mahr distribute medication on F tier. I was given the generic medication that is causing severe side effects, because these medical staff don't care about the safety of my life by listening to anything Dr. Chard Edward Saunders M.D. of St.Lukes has told them of continued care of my chronic serious medical needs for my epilepsy, which I can die from. They haven't used the correct medications, made sure they are distributed 12 hours apart, or that I am on "Medical Observation" because of (SCDPT). They took blood levels of the medications being draw/given, BUT they didn't tell the Doctor at St.Lukes Neurology that they are not the same medication prescribed, so they came back "within limits" it is within limits BUT not the right drugs. This inadequate care is result of my right to Constitutionally file my §1983 in May 2021. Pending 21-CV-2360. see attached exhibit to this claim.

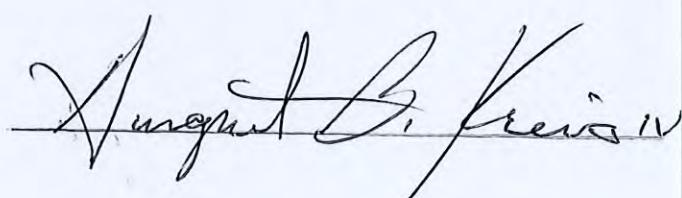
IV. Statement of Claim

D,

75. Corrections Officer D. Williams badge #
Case 5:25-cv-01486-JLS Document 2 Filed 03/12/25 Page 135 of 166
558 monitored Primecare Medical Inc. LPN Iraida
Candia-Romero distributed medications on F tier
and I was given ALL generic improper life sustaining
anti convulsants. Instead of my prescribed medications
for continued treatment of Epilepsy. My prescribed
"Brand Name" Trileptal was substituted by oxcarbazepine,
my Vimpat was substituted with Lacosamide and the
anti was also substituted by the version
distributed by Glenmark Generics Inc. from Mahwah,
NJ. Primecare Medical Inc contracted inmate care in
Northampton County Prison continues to deny, delay or
interfere with my proscribed care for the serious
medical need of epilepsy, which I was diagnosed by
Dr. Robert Coni M.D. in 2001 when I was 13. St. Lukes
Neurology has treated me for it ever since currently
being Dr. Chad E. Saunders M.D. In retaliation for
me constitutionally protected Right of filing my § 1983 in
May 2021 pending 21-CV-2360 the NCP defendants and
PCM defendants are acting the ways claimed causing
me more injuries. I am afraid for my life inside this
facility.

IV. Statement of Claim

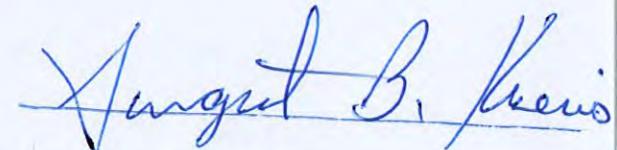
D.

Page 5 of 11 continued 

76. LPN Darcey L. Fritz of Primecare medical Inc distributed medication being escorted by Corrections officer Harrison badge # 553 and LPN Darcey L. Fritz gave me Lacosamide which is the generic form of VIMPAT. I am prescribed VIMPAT by Dr. Chad Edward Saunders M.D. of St. Lukes Neurology. The differences in these medications are causing severe side effects that I have asked numerous times about and told Primecare about by Primecare "Sick Call" slips, which by the policies in the "inmate hand book" states are answered in "24 hrs". This is a lie because I have given them numerous sick calls that are attached to this complaint and NEVER answer. Bouncing back and fourth with neuroscience medications places my life at risk of SBI or Death (SUDEP) as the Primecare Medical Inc has been told by Dr. Chad Edward Saunders M.D. in the past, all of which is in my inmate medical file "August B. Kress 2419-6383" in which I received pursuant to Initial 26(a)(1) Disclosure for pending civil Action 5:1983 21-cv-2360. In which I filed May 2020. Now being back in here in retaliation my life is at risk of deliberate indifference of my serious medical needs.

IV. Statement of claim
D.

Date: 12/27/2024



PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 12/28/2024
 Date of Birth: 02/01/1988 Location: F14

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
 A response will be given within 3 business days of receipt.

Why do you have Primecare Medical Inc,
workers talking to inmates like this?
"why are you fucking talking to me like
I know who you are. Fuck you asshole
at least I go home at night you piece of

Solution Requested:

shit, this is where you belong." Correction officer
James Spaziani badge # 552 witnessed and heard
it all. Who gave evening medication on F tier
12/27/2024 }

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

.....
 DO NOT WRITE BELOW THIS LINE

SOLUTIONS/RECOMMENDATIONS

Date Received: _____ Date Forwarded: 1/13/25

RESPONSE: This has been discussed with all staff.

Health Services Administrator:

L. Tamkewi RN/HSA

INMATE APPEAL: I do wish to appeal I do not wish to appeal

Cc: (Check all that apply)

- Director of Corrections
- Grievance File
- Warden
- Treatment Deputy
- PrimeCare R/A Office

Gard

PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 12/28/2024
Date of Birth: 02/01/1988 Location: F14

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
A response will be given within 3 business days of receipt.

A response will be given within 3 business days of receipt.

Why do you have Primecare Medical Inc.
workers talking to inmates like this?
" why are you fucking talking to me like
I know who you are. Fuck you asshole
at least I go home at night you piece of

Solution Requested:

Solution Requested:
shit, this is where you belong." Correction officer
James Spaziani badge # 552 witnessed and heard
it all. Who gave evening medication on F tier
12/27/2024 2

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

DO NOT WRITE BELOW THIS LINE

SOLUTIONS/RECOMMENDATIONS

Date Received: _____ Date Forwarded: _____

RESPONSE:

Health Services Administrator:

INMATE APPEAL: _____ I do wish to appeal _____ I do not wish to appeal

Cc: (Check all that apply)
 Director of Corrections
 Warden
 Treatment Deputy
PrimeCare R/A Office

Grievance File

B exhibit to claim 77

77. Primecare Medical Inc employee Melody distributed medication on F tier and while getting my medication I gave the employee about getting "Lacosamide", it is in the medical exhibits attached to this complaint for this date. It is an example of how many times I have brought my problems up to Primecare Medical Inc about my problems and they continue to deny or delay helping me in any way. This County just doesn't care about human life, treating humans as life as an animal. Putting my life in danger of SBE or Death (SUDEP) from serious medical need and doesn't listen to Dr. Chad Edward Saunders M.D for continued care to avoid serious injury or death. Corrections Officer Spazziani badge # 552 was present and witness to the Primecare Medical employee state "why the Fuck are you talking like I know who you Fucking are? Fuck you asshole at least I go home at you piece of shit, this is where you belong." She walked off the tier after that. The actions of these people are all as a result of retaliation from me seeking redress in the Federal Court in May 2021 51983.

IV. Statement of Claim

D.

77 continued. I just received the Initial Rule 26(a)(1) Discovery from Primecare Medical Inc. "August B. Kreis 2419-6383" and in my medical record it states that my seizure medication "is not to be crushed", but when giving me my medications on this claim's date/time she gave me ALL of my medication against my specialist's recommended care for my serious medical needs.

IV. Statement of Claim

D.

PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 12/28/2024
 Date of Birth: 02/01/1988 Location: F14

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
 A response will be given within 3 business days of receipt.

not just the medications from Glenmark Generics Inc being given to me, why when it is in my file "August Byron Kreis 2419-6383" was I never placed on "medical observation" when it is already in my file and the same

Solution Requested:

individuals are still in the jail that were in it since the initiation of 21-CV-2360? All of my specialist's conditions of continued care are known to medical care in this jail.

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

.....
 DO NOT WRITE BELOW THIS LINE

SOLUTIONS/RECOMMENDATIONS

Date Received: _____ Date Forwarded: 1/13/25

RESPONSE:

This has been rectified. No indication for med obs at this time

Health Services Administrator: J. Tanduri RN/HSAs

INMATE APPEAL: _____ I do wish to appeal _____ I do not wish to appeal

Cc: (Check all that apply)

Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

Grievance File

78. Nurse Jane Melody distributed medication and All of my medications were wrong from Glenmark Generics Inc. and will cause seizures. My Trileptal, Vimpat and Onfi were not the medications I take that my specialist prescriber at St. Lukes Neurology, Dr. Chad Edward Saunders M.D. has told Primecare medical Inc via "AVS", telephone, and Faxes. As of the result of me filing a §1983 doing my Constitutionally protected right to seek redress in the Federal Court in the month of May 2021 now I am being retaliated against now that I back in custody while the lawsuit is pending and active, 21-CV-2360. Pursuant to Fed. R. Civ. P. 26(a)(1) the Initial disclosure of "Primecare Medical Defendants" and ALL of the NEEDS told by my diagnosing St. Lukes Neurology Dr. Chad Edwards Saunders M.D is in my medical File "August Byron Kreis 2419-6383" I have put in numerous "grievances" and "medical request slips" and Medi Administrator Lauren Tambirino, Don Shane P. Caffery, Kathleen A. Mahr are ignoring medical needs "serious medical needs" placing my life in danger of SBI or death in retaliation for pending §1983 21-CV-2360.

IV. Statement of Claim

- Under Penalty of Perjury

Melody
79. RN Case 5:25-cv-01486-JLS Document 2 Filed 03/12/25 Page 146 of 166
I am distributed during medication on lock
down escorted by corrections officer Donell Spikes badge
380 and ALL 3 of my "Life Sustaining anti convulsants"
were not what is subscribed by my neurologist Dr. Chad Edward
Saunders M.D. of St. Lukes Neurology of 1417 8th Ave,
Bethlehem, PA 18018, Which is part of the continued care
of my serious medical need of epilepsy, which if not
Followed will result in SBI or Death. (SUDEP). I
have alerted the medical care staff and Prison Administat-
ion staff numerous times of me getting severe painful
headaches, dizziness, lightheadedness, but I am ignored. The
jail and jail medical staff are not following ANY
of the continued care for my serious medical needs, I
have came back inside the Northampton County Prison
with my first 51983 pending lawsuit 21-CV-2360
in fact discovery right now. Out of retaliation now
they are totally ignoring my serious medical needs,
I am afraid for my life.

IV. Statement of Claim

D.

80. Corrections Officer Liaci # 118 watched over Primecare Medical Inc. LPN Iraida Candia-Romero gave me all three "anti convulsants" that are prescribed "life sustaining" by the office of St. Lukes Neurology for having epilepsy^{diagnosed} 24 years ago and it is prescribed for continued treatment/care/therapy by Dr. Chad Edward Saunders M.D. for me to get Trileptal, Vimpat, and Onfi anticonvulsants to control my epilepsy. I am being given the wrong Vimpat continues -ly in the form of (Lacosamide) and continuously given the wrong form of Onfi in the form of (clonazepam), then I am being given the Brand name of Trileptal and then also the generic form by other medical staff marked as defendants in this complaint. Iraida Candia-Romero (LPN) is one medical staff members that continues to give me ALL 3 medication generic and wrong despite knowledge of my need for them from me being in this facility from 11/9/2020 to 2/15/2023 and all of my "code blue" seizures and me filling a constitutionally protected Right of a 42 U.S.C. §1983 and now coming back into this facility while the lawsuit

IV. Statement of Claim

D.

80 continued. Is still pending 21-CV-2360.
All listed Defendants know of my serious needs,
disregarding them, acting in retaliation and causing
deliberate indifference to a serious medical
need, inadequate medical care, denying/delaying
medical care and threatening me physically.

I have made DON Shane P. Caffery and Lauren
Tamburino aware of what is happening and they
are allowing it to continue without a care,

IV. Statement of Claim

D.

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE August B. Kreis IV DATE / FECHA 12/30/2024

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 0005264

DATE OF BIRTH / FECHA DE NACIMIENTO 02/01/1988

(UNIT / CELL) / (UNIDAD / CELULA) F14

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD Upper back
pain and severe headaches and
light headed/dizziness after medication
distribution.

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: _____

RESPONSE: _____

(SIGNATURE)

(DATE)

Claim 81, Exhibit A.

81. I was sent to medical exam room to see Kathleen A. Mahr about the 5th Primecare sick call I placed and about the time I entered she took my vitals to enter into the computer and then when I asked "Why am I having such bad headaches and side effects?" she stated "I don't know what to say to you Kreis, you're getting the medications you came to the jail with." I stated "I am definately NOT getting the same medications I came in with." She stated "I will have you see the provider for adjustments." I stated "I will need to see my neurologist." Then I said "who are you referring to?" She stated "Paulina." I stated "I DO NOT WANT PRIMECARE ADJUSTING MY MEDICATION." After that discussion she just told me "There is nothing I can do and she never even touched on me trying to make medical aware of my upper back pain. This is all in retaliation of my constitutional right to file my §1983 21-CV-2360.

IV. Statement of Claim

82. I was called down to see Paulina Foley about dizziness and light headedness that LPN Joan L. Kneas finally put into the computer the evening before, when I was in the medical exam room. Paulina Foley stated "How long ago did this start?" I replied "months ago." Paulina Foley stated "So it might not be from the increase in dosage" I stated "No." Paulina checked the next time I see my neurologist, but she stated "That is not for months." "do you want me to give you something for the dizziness?" I stated "NO I want no more drugs." Paulina stated "I will let your Neurologist know." Paulina Foley is responsible for reading the "AVS" communication from being sent on "Medical Runs" but she is denying /delaying and/or interfering in my prescribed treatment that she knows about by the fact she was here between 11/9/2020 and 2/15/2023 and she lies to my neurologist not telling them the ACTUAL medications I'm being

IV. Statement of Claim

D.

82. continued
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given, so my prescribing neurologist for my serious medical needs is thinking I'm getting the correct medication and still having seizures which is why my Trileptal was increased. When I was having seizures BECAUSE MY PROPER CARE IS STILL NOT BEING GIVEN. My mother Diane Bartromo is personally contacting my Neurologist Chad Edward Saunders MD of St. Lukes Neurology to inform them the truth, my mother is a retired registered Nurse of over 37 years. Paulina Foley is a defendant in pending case 21-CV-2360 under §1983 and as a result of my pending case under my constitutional Rights. I am being denied prescribed continued medical treatment for my serious medical needs and being shown deliberate indifference by Paulina Foley in retaliation. Placing my life in danger of SBI or Death (SUDEP).

IV. Statement of claim

D.

83. I asked for medical assistance since last night around the end of second shift and Corrections Officer James Spaziani badge # 5502 called for medical assistance and then third shift corrections officer also called and due to DON shane P. Caffery and the Medical Administrator Lauren Tamburino not doing their job of controlling and refiling of supplies and monitoring and admonishing medical staff even after I have made them very much aware through Primecare sick calls and Primecare grievances, the two above mentioned defendants choose to deny/delay and/or interfere with my medical care as prescribed by Dr. Chad E. Saunders M.D. of St. Luke's Neurology. As a result of being prescribed by the above named Specialist required to have continued prescribed care to prevent SBI or death. (SUDEP).

The above mentioned defendants are acting with deliberate indifference to my serious medical needs as a result of retaliation for my constitutionally protected Right to file my Title 42 USC §1983 pending 21-CV-2360.

IV. STATEMENT OF CLAIM

D.

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PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis Date: 12/04/2024
 Date of Birth: 02/01/1988 Location: E14

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
 A response will be given within 3 business days of receipt.

it states at the page PCM000617 "magnets placed in bottom right desk drawer in medical exam room"
03/10/2021 I also just told Shene P. Coffery to "please place the second VNS magnet in a place that all medical staff can be able to

Solution Requested:

gain access to if I go into an epileptic episode pursuant to "pcm" "AVS" communication with Chad Edward Sander M.D. of St. Lukes Neurology it is to be swiped EVERYTIME there is an epileptic Episode. The excuse is made

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

.....
 DO NOT WRITE BELOW THIS LINE

SOLUTIONS/RECOMMENDATIONS

Date Received: 12-5-24 Date Forwarded: 12-5-24

RESPONSE: A grievance written in 2024 will not address any actions taken or not taken in 2021. Currently, your second VNS magnet is being kept in medical and staff has been educated to use it when necessary.

Health Services Administrator: L. Tamburini RN/HSA

INMATE APPEAL: I do wish to appeal I do not wish to appeal

Cc: (Check all that apply)
 Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

Grievance File

PRIME CARE
MEDICAL +
HOME CARE

File Online for Quality Care
At Your Service 800-222-1222

Page 5

CONFIDENTIAL DISCLOSURE FORM

INSTRUCTIONS: Fill in all the applicable information concerning your to the best of your knowledge and belief.

Medical Record

Date of Birth:

Date of Birth:

Date of Birth:

Date of Birth:

Location:

Location:

Location:

DISCLOSURE (Give names of relatives, friends, etc., who have or had knowledge of your condition, sign witness):

of family strongest: Medical Record to enter in
most likely to know about your health status method
of getting information & getting
information from other sources of
to enter in the health record, if possible

Signature: _____

REMARKS: _____

INSTRUCTIONS: Once you have completed this form, please initial each line to show you understand

confidentiality of your personal information contained herein. You may attach additional pages if necessary.

DO NOT WRITE BELOW THIS LINE

SOLUTIONS COMMUNICATION

Date Received: 12-2-94 Date Faxed: 12-2-94 Date Received: 12-2-94

RESPONSE: A doctor was seen for a routine check up. He found a small lump in the left breast and advised it be biopsied. The lump was removed and sent to the pathology lab for analysis.

ACT/Hospital Primary Physician

Hospital Services Authorization:

Issue of date of I _____ I do not wish to discuss _____

NAME: DR. JAMES ALLEN

Information File

Co. (Check all that apply)

Primary Care Physician

Physician

Emergency Doctor

Home Health

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PRIMECARE**MEDICAL +**The Choice for Quality Contract Services.
A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: _____ Date: _____

Date of Birth: _____ Location: _____

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
 A response will be given within 3 business days of receipt.

By primecare that I did not have it on, but it is stated on "August Byron Kreis #2419-6383" that the second magnet was in the "Exam room drawer" the entire time and not used once ???. Like I told primecare in 2021 if I am in an epileptic episode while sleeping my fiance would use

Solution Requested:

my vns implant by saying the mag. I do agree that medical had the second magnet the entire time because, I was given it upon release. Please use it

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

..... **DO NOT WRITE BELOW THIS LINE****SOLUTIONS/RECOMMENDATIONS**

Date Received: _____ Date Forwarded: _____

RESPONSE:

Health Services Administrator: _____

INMATE APPEAL: _____ **I do wish to appeal** _____ **I do not wish to appeal**

Cc: (Check all that apply)

Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

 Grievance File

exhibit B to claim 84

PRIMECARE

MEDICAL +

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Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 4/12/2025

Date of Birth: 02/01/1988 Location: F14

GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
A response will be given within 3 business days of receipt.

why are non medical DOC staff making medical decisions that I am to be "hand cuffed during an epileptic episode? LT, Anthony Pier badge # 37.

Solution Requested:

Please have trained medical staff make the decisions.

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

..... **DO NOT WRITE BELOW THIS LINE**

SOLUTIONS/RECOMMENDATIONS

Date Received: _____ Date Forwarded: _____

RESPONSE:

.....
.....
.....
.....

Health Services Administrator: _____

INMATE APPEAL: _____ **I do wish to appeal** _____ **I do not wish to appeal**

Cc: (Check all that apply)
 Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

Grievance File

Claim 84 exhibit C.

84. I meant to go take my medications for distribution in front of Corrections Officer Polanco #319 and right after taking up my position in line I went into a "CODE BLUE" medical Emergency for an epileptic episode. This is due to the inadequate medical care and the deliberate Indifference by all listed defendants giving me improper medications, not being on medical observation and the medical staff in this facility never ONCE directed or directly did use my VNS implant magnet during the pending civil rights complaint 21-CV-2360.

As a result of the filing of my constitutionally protected redress in the Federal Court now coming back into this during pending case 21-CV-2360 I am being treated in retaliation. Lt. Anthony Pier badge #37 asked if anyone in the medical department knew about the use of my VNS magnet and the medical staff stated "NO". Which, relating to attached exhibits A & B shows that the primecare staff lie in acts of retaliation. I was also given my medication by LPN Sarah in the medical exam room in front of Lt. Anthony Pier and I compliantly took them even though they were ALL the wrong prescribed "anti convulsants / life sustaining medications". I'm afraid for my life do to SBI or Death (SUDEP). The nasty comment was made by defendant Darcey L. Fritz.

IV. STATEMENT OF CLAIM

D.

84 con. LPN to Corrections Officer James Spaziani badge # 552 "We can't stop a seizure, if he has one just call a code blue!" When James Spaziani called medical to get tylenol due to me having a severe headache. This is not necessarily true, if I was receiving the proper care I wouldn't be having them, I don't have these problems outside of here.

IV. STATEMENT OF CLAIM

D,

Page 5 of 11 continued

August B. Kaino IV

PRIMECARE

MEDICAL +

The Choice for Quality Contract Services.
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Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 1/6/2025Date of Birth: 2/1/1988 Location: F14GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
A response will be given within 3 business days of receipt.

I spoke to my mother Diane Lynn Bartiromo about the seizures that I am having and it was confirmed inside and outside that the treatment being given is continuing to cause problems with my severe epilepsy. My mother will be contacting Dr. Chad E. Saunders M.D.

Solution Requested:

St. Lukes Neurology. My mother will also be talking to the specialist about me having to be handcuffed in a seizure pursuant to Lt. Anthony Pier #37. You are supposed to be the medical department. Primecare continues to break my rights.

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

.....
DO NOT WRITE BELOW THIS LINE
.....**SOLUTIONS/RECOMMENDATIONS**Date Received: 1/7/25 Date Forwarded: 1/13/25RESPONSE: Communication is being maintained with your outside specialist and all recommendations are being followed.Health Services Administrator: J. Tamburini RN/HSAINMATE APPEAL: I do wish to appeal I do not wish to appeal

Cc: (Check all that apply)

- Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

 Grievance File

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Claim 85 exhibit A.

claim. 85 exhibit B.

PRIMECARE

MEDICAL +

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A Division of PIHS, Inc.

Log #: _____

CONFIDENTIAL GRIEVANCE FORM

INSTRUCTIONS: Fill in all the information requested down to the dotted line in blue or black ink.

Name: August B. Kreis IV Date: 1/12/2025Date of Birth: 02/01/1988 Location: F14GRIEVANCE (Give names of persons involved, date(s), specific location of incident or condition, and witnesses.):
A response will be given within 3 business days of receipt.

*why are non medical DOC staff making
medical decisions that I am to be "hand cuffed"
during an epileptic episode? LT, Anthony
Pier badge # 37.*

Solution Requested:

*Please have trained medical staff make the
decisions.*

INSTRUCTIONS: Once you have completed this form, please place in medical sick call box. If you need assistance, contact your assigned treatment counselor or have your block officer contact the Health Services Administrator.

DO NOT WRITE BELOW THIS LINE

SOLUTIONS/RECOMMENDATIONSDate Received: 1/13/25 Date Forwarded: 1/13/25

RESPONSE: The practice of hand cuffing is not a medical decision, it is a safety decision. As long as medical staff is present to ensure your safety during this practice, management will not intervene.

Health Services Administrator: J. Tamini RN/HSAINMATE APPEAL: I do wish to appeal I do not wish to appeal

Cc: (Check all that apply)
 Director of Corrections
 Warden
 Treatment Deputy
 PrimeCare R/A Office

 Grievance File